

Housing Action Plan

Identifying actions to support the delivery of new housing

November 2022



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Summary

- i. East Suffolk Council first produced a Housing Action Plan in 2019 and produced updates in 2020 and 2021. This fourth Housing Action Plan for East Suffolk reports on progress and delivery made over the past year on actions identified in the previous three Housing Action Plans and identifies new challenges that have arisen.
- ii. The Housing Delivery Test was introduced by the Government in 2018 and assesses how successful each Local Authority has been at supplying the required number of houses in the previous three financial years. In Local Planning Authority areas where less than 95% of the required housing has been delivered over the past three years, authorities must produce a Housing Action Plan. In those areas where less than 85% of the requirement was delivered there is an additional requirement to apply a 20% buffer in calculating 5-year land supply, and where less than 75% is delivered the 'presumption in favour of sustainable development' would also apply in decision making. The Government intends to publish the results of the Housing Delivery Test in November each year (for the past three full financial years) and transitional arrangements mean that the requirements outlined above were phased in over the period up to November 2020¹. A 'presumption in favour of sustainable development' is applied to Housing Delivery Test result below 75% from 2020 onwards. The purpose of a Housing Action Plan, as set out in paragraph 76 of the National Planning Policy Framework, is to assess the causes of under-delivery and identify actions to increase delivery in future years.
- iii. Four sets of Housing Delivery Test Results have been published since 2018 and are set out Table 1 - 4 in Chapter 1. Following the publication of the 2018 test result for the former Waveney area the Council had to produce a Housing Action Plan and apply a 20% (rather than 5%) buffer when calculating the 5-year land supply. Following the publication of the 2019 test result for the former Waveney area the Council had to produce a Housing Action Plan, but the improved result brought the area out of the requirement to apply a 20% buffer when calculating the 5-year land supply (with a 5% buffer to be applied instead). There have been no consequences from the publication of the 2020 and 2021 test results.
- iv. East Suffolk Council is in a positive position in terms of setting out its planned approach to housing delivery, with the Local Plan for the former Suffolk Coastal area adopted in September 2020, and the Local Plan for the former Waveney area 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 former Waveney area, the Local Plan has

¹ The transitional arrangement, which was initially set out in Annex 1 of the now-superseded 2019 National Planning Policy Framework and has been carried forward in the 2021 NPPF, is the 'presumption in favour of sustainable development' being applied to 2018 Housing Delivery Test results below 25% and 2019 Housing Delivery Test results below 45%.

sought to address previous reasons for under delivery in the Local Plan with a range of site allocations that exceed the minimum level of housing needed by approximately 12%.

- v. The Council maintains a proactive approach to housing delivery with progress made on several initiatives since the publication of its first Housing Action Plan in August 2019. Significant progress has been made in several areas and in the past year, this includes a Residential Development Brief for Land north of Union Lane being adopted and an Affordable Housing Supplementary Planning Document being adopted. The actions detailed in the Housing Action Plan are focused on improvements to procedures in the Planning Service, policy implementation, and monitoring of the new and emerging Local Plans and the site allocations within them.
- vi. The Council is also working to deliver the actions detailed in the Housing Enabling Strategy. Work is taking place with Housing Associations, Registered Providers and Community Groups to establish what the local needs are, support the development of exceptions sites for affordable homes and identify opportunities for spending commuted sums to deliver affordable houses. The Council is also working with developers to achieve the optimum mix of affordable and marketing homes. Work is underway to enable the introduction of early Homes England funded First Homes.
- vii. The pandemic impacted the economy, the construction industry and housing market. However, the housing market has been strong since the first lockdown due to changes to Stamp Duty, increased housing demand and changes in the way in which people live and work. However, there are recurring issues related to building material supply and cost that is continuing to have an impact on housing construction. More recently, the present economic situation including inflation and rising interest rates will no doubt impact on the housing sector. The Housing Action Plan assesses the impact of recent and current issues on housing delivery in East Suffolk to ensure the Council is informed and able to take proactive steps where practically possible to help the delivery of houses to meet the ambitious targets in the two Local Plans.
- viii. 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.
- ix. Regardless of future Housing Delivery Test results, East Suffolk intends to produce an annual Housing Action Plan as a tool to 'check' the progress and success of actions to secure housing delivery and enable the Council to take early steps to minimise any future risk of under delivery.

1 Introduction

Background

- 1.1 The first [East Suffolk Housing Action Plan](#) was published in August 2019, the second was published in August 2020 and the third in August 2021. This fourth Housing Action Plan provides the result of the latest 2021 Housing Delivery Test, updates the previous plan and reports on recent progress with housing delivery.
- 1.2 East Suffolk Council was created on 1st April 2019 comprising the areas formerly covered by Suffolk Coastal and Waveney Districts. East Suffolk Council is committed to delivering new housing to meet identified needs and to increase the mix of housing available, including affordable housing. Since the publication of the 2019 Housing Action Plan, the Council has made great advances in setting out its approach to housing delivery. The Housing Action Plan sits alongside East Suffolk Council's [Strategic Plan](#) (2020-2024), [Housing Development Strategy](#) (2020-2024), [Housing Strategy](#) (2017-2023) and [Housing Enabling Strategy](#) (2020-2025). The Strategic Plan, agreed in early 2020, sets the corporate objectives for East Suffolk: growing our economy, enabling our communities, remaining financially sustainable, delivering digital transformation, and caring for our environment.² One of the priorities set out under 'Growing our economy' is to 'Build the right environment for East Suffolk' which includes having the right supply of housing. Delivery of housing is therefore a key part of the Council's ambition.
- 1.3 The Housing Enabling Strategy, approved in May 2020, integrates the work of a number of teams within the Council (Housing, Planning, Asset Management, Communities and Economic Development and Regeneration) and sets out the Council's ambitions for housing delivery over the coming years and sets specific actions to take forward between 2020 and 2025.
- 1.4 The Housing Development Strategy, approved in January 2020, sets out the Council's approach to building more housing. The overarching objective is to meet housing need by providing high quality sustainable housing at affordable rents and sale values in all areas of East Suffolk. It seeks to "improve our residents' quality of life by building new homes" and "identifies a broad need for new affordable homes for rent"³.
- 1.5 The above plans sit alongside the Council's existing Housing Strategy which seeks over the six-year period (2017-2023) to increase the amount of Council owned affordable housing to more than 5,100 homes, increase the overall number of affordable homes in East Suffolk by

² <https://www.paperturn-view.com/uk/east-suffolk/strategic-plan-2020-2024?pid=Nzg78875&v=1.1>

³ <https://www.eastsuffolk.gov.uk/assets/Housing/Housing-Development-Strategy.pdf>

250 units per annum, and intervene to deliver the Kirkley Waterfront and Sustainable Urban Neighbourhood development⁴.

- 1.6 The Local Plan for the former Waveney area⁵ (excluding the area covered by the Broads Authority) was adopted in March 2019 and a new Local Plan for the former Suffolk Coastal area⁶ was adopted in September 2020. The Local Plans contain site allocations and policies to deliver, and exceed, the new housing needed.
- 1.7 The Council's ambition emulates the Government's drive to boost housing supply, as reflected in the National Planning Policy Framework (NPPF). Revisions to the NPPF in 2018 introduced the Housing Delivery Test as a means by which to measure past housing delivery at the local planning authority level. The Housing Delivery Test measures the delivery of housing over the past three years against the housing requirement or local housing need calculated under the national standard methodology and calculates this as a percentage figure, as set out in the Housing Delivery Test Measurement Rule Book⁷. The Government intends to publish the results in November each year. The results of the Housing Delivery Test are applied as follows:
- the publication of an action plan if housing delivery falls below 95%;
 - a 20% buffer on a local planning authority's 5-year land supply if housing delivery falls below 85%;
 - and the presumption in favour of sustainable development if housing delivery falls below 75%, following the end of transitional arrangements⁸.
- 1.8 Where a housing action plan is to be produced, paragraph 76 of the NPPF states that this should assess the causes of under-delivery and identify actions to increase delivery in future years. The NPPF and accompanying Planning Practice Guidance are not prescriptive in terms of the content and scope of a Housing Action Plan, however the Planning Practice Guidance

⁴ <https://www.eastsuffolk.gov.uk/assets/Housing/East-Suffolk-Housing-Strategy-2017-2023/East-Suffolk-Housing-Strategy-2017-23.pdf>

⁵ www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Adopted-Waveney-Local-Plan-including-Erratum.pdf

⁶ www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Suffolk-Coastal-Local-Plan/Adopted-Suffolk-Coastal-Local-Plan/East-Suffolk-Council-Suffolk-Coastal-Local-Plan.pdf

⁷

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

⁸ A transitional period was initially set out Annex 1 of the 2019 NPPF (carried forward in the 2021 NPPF) under which the presumption in favour of sustainable development was to apply where the Housing Delivery Test results published in November 2018 indicate that delivery was below 25%, the Housing Delivery Test results published in November 2019 indicate that delivery was below 45% and the Housing Delivery Test results published in November 2020 and subsequent years indicate that delivery was below 75% (note that the 2018 and 2019 results were published in the following February and the 2020 result was published in the following January).

does provide a list of the aspects that a local authority could review and the actions that a local planning authority could consider.⁹

- 1.9 The method for calculating the Housing Delivery Test result for the 2019/20 monitoring year was amended by the Ministry of Housing, Communities and Local Government (MHCLG) to reflect the impact the pandemic and the initial lockdown had on the construction industry in March 2020. “For the 2020 measurement, there is a reduction in the period for measuring total homes required – usually this would be measured over a three-year period, but an 11-month period has been used for the 2019/20 monitoring year. This is to account for disruption to housing delivery and monitoring caused by restrictions announced on 23 March 2020, in response to the COVID-19 pandemic.”¹⁰
- 1.10 The method for calculating the Housing Delivery Test result for the 2020/21 monitoring year was amended by the Department for Levelling Up, Housing and Communities to reflect the impact the pandemic had on the construction industry in the year 2020/21. “In order to reflect the national disruption caused to housing delivery by the pandemic to starts and completions, construction, and monitoring of completions, the period for measuring homes required in 2020/21 has been reduced by 4 months. A 1-month reduction in the period for measuring the ‘homes required’ in 2019/2020 also still applies.”¹¹
- 1.11 The former Suffolk Coastal and Waveney areas were previously assessed separately. Following the publication of the 2018 Housing Delivery Test result, the former Waveney area was required to produce a Housing Action Plan and apply a 20% buffer to the housing requirement for the purpose of assessing the Housing Land Supply. Following the publication of the 2019 Housing Delivery Test result the former Waveney area was required to publish a Housing Action Plan. Following the publication of the 2020 Housing Delivery Test result no action was required of East Suffolk. The Housing Delivery Test results from 2018, 2019, 2020 and 2021 were as follows:

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

¹⁰

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

¹¹ www.gov.uk/government/publications/housing-delivery-test-2021-measurement/housing-delivery-test-2021-measurement-technical-note

LPA	Number of homes required ¹²				Number of homes delivered ¹³				HDT result
	2015-16	2016-17	2017-18	Total	2015-16	2016-17	2017-18	Total	
Suffolk Coastal	465	465	392	1,322	564	550	582	1,696	128%
Waveney	312	313	299	925	133	243	293	669	72%

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

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

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

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

Figure 3 2020 Housing Delivery Test results published January 2021

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

Figure 4 2021 Housing Delivery Test results published January 2022

- 1.12 There is no requirement under the NPPF to produce a Housing Action Plan, where the Housing Delivery Test has identified that delivery has been above 95%. Planning Practice Guidance advises that ‘any authority may produce an action plan as a matter of good practice to identify ways to support delivery.’¹⁴ East Suffolk Council has chosen to publish a Housing Action Plan annually for the whole district each year reflecting its corporate objectives surrounding housing delivery.

¹² Based on the [Housing Delivery Test Rule Book](#), which includes transitional measures whereby household projections are applied where plans are over 5 years old.

¹³ Note - The calculation of homes delivered includes residential institutions and is explained in the Housing Delivery Test 2018 Measurement Technical Note published alongside the results https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779782/HDT_technical_note.pdf.

¹⁴ Planning Practice Guidance Paragraph: 048 Reference ID: 68-048-20190722 Revision date: 22July 20109

Purposed and scope of this action plan

- 1.13 This document represents the Council's Housing Action Plan as per paragraph 76 of the NPPF. As set out in paragraph 1.11 above, the Council achieved 107% in the 2021 Housing Delivery Test and is therefore not required to produce an action plan but nevertheless considers it good practice to monitor and review its actions on housing delivery and to report on this on an annual basis. The production of this update has focused on considering whether the causes of under delivery identified in the previous Housing Action Plans are still valid, reporting on progress made against actions identified in the 2021 Housing Action Plan, identifying whether there are potential new/future causes of under delivery of housing (albeit the Housing Delivery Test has been passed), how any issues identified relate to planned growth and identifying actions to address these issues. The housing requirements for East Suffolk are set out below:
- Former Suffolk Coastal area: 542 dwellings per year, as set out in the Suffolk Coastal Local Plan (2020).
 - Former Waveney area: 374 dwellings per year, as set out in the Waveney Local Plan (2019).
- 1.14 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 design¹⁵.
- 1.15 The East Suffolk Housing Strategy 2017-23 sets out the Council's approach to addressing housing needs, particularly the need for affordable housing. The five areas of focus include 'increasing the supply of new housing to meet a range of needs – a more proactive role for East Suffolk supporting the development of affordable homes'.
- 1.16 The Housing Action Plan sits alongside the Council's Housing Enabling Strategy (2020-2025) and Housing Development Strategy (2020-2024). The Housing Enabling Strategy was produced jointly by the Housing and Planning services, with input from other areas of the Council, and sets out the corporate approach to increasing housing delivery, setting out a range of actions including the use of the Council's assets to meet the aims of the housing

¹⁵ <https://www.eastsuffolk.gov.uk/planning/design-and-conservation/quality-of-place-awards/2022-quality-of-place-awards/>

strategies, engaging with a wider range of developers, supporting community led housing and the role of the Council in the delivery of rural exception sites.

- 1.17 The Council's Housing Team have a programme of work underway to deliver new homes across East Suffolk. Several sites are being redeveloped, including the former Deben High School site which has planning permission for 61 PassivHaus homes with leisure and sport facilities and is an award winning scheme.
- 1.18 The Council is working closely with Registered Providers, Town and Parish Councils and Community Groups to raise awareness of the Housing Enabling Strategy and the support available from the Council, and to encourage community led housing projects. The Council's Housing Service have also supported SouthGen to bring forward an exemplar scheme in Southwold that was completed March 2022 and supported the Peninsula Villages Community Land Trust (PVCLT) in their development of four affordable homes in Bawdsey which are expected to be completed early 2023.
- 1.19 The Council, led by its Housing Strategy and Enabling service, is developing an older person's housing strategy which is designed to promote and encourage housing for retired aged people across all tenures. Work on the strategy is exploring the mix of flats and bungalows required to promote independent living for all tenure types. Work on the strategy is evolving but the aim is that the strategy is to help guide the provision of age-appropriate homes and ensure they are delivered in the right locations across all tenures. A draft of the [Older Persons Housing Strategy](#) has been produced and a public consultation is planned.¹⁶ The Housing Service has also commissioned an online evidence base to support future housing strategy work.
- 1.20 The Housing Development Strategy details the Council's commitment and approach to building and acquiring properties and land in East Suffolk. The Council is now playing an active role in acquiring and developing sites for housing. The actions include a commitment to review corporately all Council owned land to identify potential development sites for new Council housing and to develop a three-year rolling development programme to achieve 50+ units per annum.
- 1.21 This Housing Action Plan therefore focuses on actions that are specific to planning, however it also identifies linkages with wider corporate objectives and actions where relevant.
- 1.22 The Council separately publishes a [Housing Land Supply Statement](#)¹⁷ to identify the supply of deliverable sites for housing for the five years between 1st April 2022 and 31st March 2027.

¹⁶ www.eastsuffolk.gov.uk/housing/older-persons-housing-strategy/

¹⁷ www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/open-data/housing-land-supply/

1.23 Whilst the purpose of the Plan is to set out actions to maintain housing delivery, it is relevant to acknowledge that recent actions the Council has taken in the past year, since the publication of the 2021 Housing Action Plan will not be reflected in the 2021-22 housing completion figures.

The East Suffolk Area Profile

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

Geography

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

Population

- 1.26 East Suffolk Council is the largest District Council in England by population with 245,900¹⁸ people. There are no cities in Suffolk and the largest towns in East Suffolk are, in order of population size, Lowestoft, Felixstowe and Kesgrave. There are a high proportion of older people in East Suffolk. Over 65s make up 27.8% of the total population in East Suffolk compared to 18.4%¹⁹ across England. East Suffolk together with the rest of Suffolk is projected to have an increasingly aging population in the coming years.

Housing

- 1.27 The affordability ratios for housing show that average house prices have increased at a faster rate than average earnings resulting in houses becoming less affordable.

¹⁸www.suffolkobservatory.info/population/report/view/17e45add2fd547c38a1a20bc2635673b/E07000244

¹⁹www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesenglandandwales/census2021#population-sizes-and-changes-for-regions-and-local-authorities

Year	East Suffolk	England
1997	-	3.54
2000	-	4.19
2005	6.77	6.79
2010	6.86	6.85
2014	6.79	7.09
2015	7.60	7.52
2016	7.69	7.72
2017	8.26	7.91
2018	8.70	8.04
2019	7.86	7.88
2020	8.27	7.86
2021	9.74	9.05

Figure 5 Affordability ratios²⁰

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

	2019	2020	2021
Suffolk Coastal	£282,500	£285,000	NA
Waveney	£190,000	£198,727	NA
East Suffolk	£235,000	£245,000	£275,250

Figure 6 Median house price by local authority district (for the 12 months ending September)

	2019	2020	2021
Suffolk Coastal	£31,556	£30,335	NA
Waveney	£27,027	£26,604	NA
East Suffolk	£29,901	£29,625	£28,262

Figure 7 Median gross annual work-based earning by local authority district

²⁰www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian/current

Methodology

- 1.29 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.
- 1.30 The Planning Advisory Service has produced tools to assist local planning authorities in producing action plans, and the Council has referred to these for guidance. The Council has also actively participated in workshops held in 2019 and 2020 by the Planning Advisory Service to learn from others and ensure that it is developing effective action plans.
- 1.31 The methodology that East Suffolk Council has followed is summarised below. The Council has taken a proportionate approach that allows each Housing Action Plan to be read as an independent document whilst also seeking to avoid unnecessary repetition of the information provided in the previous Housing Action Plan. It is focused on developing its understanding of any historic, current and potential future issues affecting delivery.
- 1.32 The starting point for this Housing Action Plan is that the Housing Delivery Test has been passed. Therefore, the Council is starting from a positive position, and the Housing Action Plan will seek to reinforce and strengthen this.
- 1.33 The former Suffolk Coastal area housing requirement set out in the 2013 Core Strategy was 465 dwellings per year and was consistently exceeded between 2015/16 and 2019/20. The 2020 Suffolk Coastal Local Plan sets out a more ambitious requirement of 542 dwellings per year, based on the local housing need calculated under the Government's standard methodology. The 2020/21 and 2021/22 housing delivery figures in the former Suffolk Coastal area were below the ambitious target in the Local Plan and previous levels of delivery. The reasons for this are explored in this Housing Action Plan.
- 1.34 The former Waveney area has consistently delivered fewer completions than the housing requirement. The former Waveney area housing requirement set out in the 2009 Core Strategy was 290 dwellings per year, and the 2019 Waveney Local Plan sets a higher requirement of 374 dwellings per year based on the objectively assessed need for housing evidenced by the Strategic Housing Market Assessment.
- 1.35 The drop in housing completions in the former Waveney area from 297 to 159 between 2018/19 and 2019/20 was a significant decrease and the reasons were unclear. The Housing Action Plan published in 2019 explored in detail past reasons for low housing delivery in the Waveney area over recent years. Housing delivery increased slightly in 2020/21 to 201, but this was still well below the target rate. It is however very encouraging that the 323 houses were completed in 2021/22.

	2014/ 15	2015/ 16	2016/ 17	2017/ 18	2018/ 19	2019/ 20	2020/ 21	2021/ 22
Former Suffolk Coastal area	427	565	548	582	588	660	510	499
Former Waveney area	136	135	264	284	297	159	201	323

Figure 8 Total annual housing completions

- 1.36 The Council annually publishes a Housing Land Supply Statement, setting out the number of years supply of land available for housing for each Local Plan area. Since 2019 the Council has been seeking more information on deliverability from developers, landowners and agents. In 2020 and 2021 the Council also considered it important to gain an understanding of the impacts of the Covid-19 pandemic on the development of specific sites that are allocated, have planning consent or are under construction. This information was gathered through questionnaires, and analysis of responses informed the 2021 Housing Action Plan and the Housing Land Supply Statement.
- 1.37 This 2022 Housing Action Plan seeks to build on the previous three Housing Action Plans and the aims set out in the Waveney Local Plan and Suffolk Coastal Local Plan. To update and enhance the Council's understanding of the deliverability of the new Local Plans, information gathering and analysis has been undertaken:
- Analysis of national and global issues impacting the construction industry such as Covid-19, BREXIT, global supply chain problems and price rises;
 - Analysis of local issues that are impacting housing delivery, such as the new bridge and flood defences in Lowestoft which supports the delivery of new homes in the area;
 - An update of analysis of planning processes and stages of housing delivery, revisiting the analysis in the 2021 Housing Action Plan;
 - Analysis of impacts of Covid-19 locally and nationally on housing delivery;
 - Analysis of other local, national and global issues that are impacting housing delivering;
 - Analysis of the work being carried out by the Planning Service to support housing delivery; and
 - A review of planned developments in East Suffolk.
- 1.38 Linked to the analysis above, actions are then identified, considering those areas where there is likely to be the biggest impact. These can be categorised as follows:
- Actions related to the Planning Service;
 - Actions related to the monitoring and review of the Housing Action Plan.

- 1.39 The Council has undertaken internal engagement with Building Control, the Housing Team and Development Management as part of the production and review of the Housing Action Plan.
- 1.40 Mechanisms for reviewing and monitoring the Housing Action Plan have been identified, related to the actions.

Suffolk Coastal Local Plan

- 1.41 The Suffolk Coastal Local Plan was adopted by East Suffolk Council in September 2020. The former Suffolk Coastal area has had strong housing delivery that exceeded set annual requirements between 2015/16 to 2019/20. The 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.
- 1.42 The Local Plan sets out a strategy which focuses on the A12 / A14 and railway corridor including the development of two new Garden Neighbourhoods at Saxmundham and Felixstowe and a number of site allocations in rural areas. To meet, and exceed, the requirement of 542 dwellings per year the strategy identifies sites to meet the residual need of 2,758 dwellings (i.e., those not already allocated or with permission at 31.3.18), plus provides a 16.5% contingency on top of this, and also includes policies to support an anticipated windfall delivery of 800 dwellings over the plan period. The approach is to provide a diversity of supply of sites.
- 1.43 Whilst the requirement of 542 dwellings per year was not met in the 2020/21 year or 2021/22 when 511 and 499 respectively were completed, these monitoring years were affected by Covid-19 restrictions and global supply chain issues. The figures suggest the recent lower level of housing delivery in the Suffolk Coastal area has been affected by a reduction in the number of windfall developments coming forward, though windfall remains a large proportion of current housing delivery. 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, and the majority of windfall sites delivering 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 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.

	Suffolk Coastal 2019/20	Suffolk Coastal 2020/21	Suffolk Coastal 2021/22
Net dwellings completed	660	511	499
Of which are on windfall sites	524	434	334
Of which are on allocated sites	136	77	165

Figure 9 Total annual housing completions on windfall and allocated sites

Waveney Local Plan

- 1.44 The Waveney Local Plan (March 2019) housing requirement is the objectively assessed need as calculated through the Strategic Housing Market Assessment under the 2012 NPPF. The Strategic Housing Market Assessment identified a need for 8,223 new homes over the plan period of 2014-2036 which equates to 374 homes a year. The Waveney Local Plan aims to exceed this minimum target by providing 9,235 new homes during the plan period, excluding any expected contribution from windfall development. This represents a significant increase and challenge when compared to the previous Core Strategy (2009) figure of 290.
- 1.45 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.
- 1.46 The Waveney Local Plan was adopted in March 2019 meaning that to date there is still relatively limited information available to fully assess the effectiveness of the new spatial strategy in delivering housing. However, monitoring of housing delivery will continue to be undertaken as the Plan is implemented.

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

Figure 10 Total annual housing completions on windfall and allocated sites

- 1.47 In the past three years the number of houses delivered on windfall sites has fluctuated between 116-155 dwellings a year while there has been a significant increase in the number of houses delivered on allocated sites from 18 – 168. As larger and strategic sites within the Waveney Local Plan are developed the expectation is that more dwellings will be delivered on the allocated sites. This is showing the impact the adoption of the Local Plan in 2019 is now having on housing completions.

Neighbourhood Plans

- 1.48 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’. 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.
- 1.49 There are currently fifteen Neighbourhood Plans that have been made across East Suffolk. These are for Beccles, Bredfield, Framingham, Great Bealings, Kesgrave, Kessingland, Leiston, Lound, Ashby, Herringfleet and Somerleyton, Martlesham, Melton, Mutford, Rendlesham, Reydon, Southwold and Wenhasston with Mells Hamlet.
- 1.50 The examination of the Bungay and Worlingham Neighbourhood Plans has recently taken place and they are proceeding to referendum on 17th November 2022. Halesworth, Oulton, Rushmere St Andrew and Shadingfield, Sotterley, Willingham and Ellough Neighbourhood Plans all completed their Regulation 16 consultations and at the time of writing are all at the examination stage.
- 1.51 In the former Suffolk Coastal 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.” Some ‘made’ Neighbourhood Plans, such as Bredfield, Framlingham and Leiston have already allocated 30, 105 and 390 dwellings respectively, and the Wickham Market Neighbourhood Plan which is currently undergoing publication under Regulation 16 is proposing site allocations to deliver up to 110 dwellings.
- 1.52 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 with a total of 105 new dwellings and contains housing policies to support affordable housing and residential infill and backland development. The Bungay Neighbourhood Plan, which has reached Referendum stage (to be held in November), allocates a site for an additional 70 dwellings. It is expected that Neighbourhood Plans will support the strategy set out in the Local Plan and will contribute positively towards the delivery of housing, which may include appropriate site allocations.

- 1.53 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/>.
- 1.54 The Council is producing Neighbourhood Plan guidance to help deliver housing through planning policies and site allocations in plans. The guidance will include information on planning for various house types including self-build and custom build houses and community led housing. The guidance is due to be published in 2023.
- 1.55 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/>
- 1.56 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

- 1.57 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.
- 1.58 The Government chose to amend the standard method for calculating the 2020 Housing Delivery Test to reflect the impact of the pandemic on the delivery of housing. The period for calculating the homes required in 2019/20 was reduced by 1 month.
- 1.59 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.
- 1.60 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.
- 1.61 The 2022 Housing Delivery Test result for the period April 2019 – March 2022 can be forecast with some accuracy using housing completion data.
- 1.62 For future Housing Delivery Test results there will remain uncertainties caused by the ongoing global impact of continuing global supply chain issues, significant rising energy prices and an increased cost of living and their impact on the economy, construction industry and housing market that cannot be fully anticipated at this time. In the absence of any information to the contrary, it should be assumed that the annual Housing Delivery Tests will continue with the same consequences for under delivery to Local Planning Authorities.
- 1.63 As set out in the paragraphs above, the 2021 Housing Delivery Test results, as published by the Government in January 2022, are as follows:

	Number of homes required ²¹				Number of homes delivered ²²				HDT result
	2018-19	2019-20	2020-21	Total	2018-19	2019-20	2020-21	Total	
East Suffolk	886	833	581	2,300	923	832	715	2,4700	107%

Figure 11 2021 Housing Delivery Test results published in January 2022²³

²¹ Based on the [Housing Delivery Test Rule Book](#), which includes transitional measures whereby household projections are applied where plans are over 5 years old.

²² Note - The calculation of homes delivered includes residential institutions and is explained in the Housing Delivery Test: 2019 Measurement Technical Note published alongside the results https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/865156/HDT_Technical_Note_2019.pdf

²³ The government calculates the number of housing completions in a slightly different manner to Local Planning Authorities, particularly in relation to communal accommodation such as nursing homes. This results in small differences between the figures reported in the Council's Annual Monitoring Reports (AMR) and the figures in the government's Housing Delivery Test results.

- 1.64 The 2022 Housing Delivery Test results, which are proposed by the Housing Delivery Test Rule Book to be released in November 2022 (although are usually delayed until the new year), can be anticipated with some accuracy as the completions figures and housing need figures are known.
- 1.65 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.
- 1.66 The housing need calculated as at 1st April 2021 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 528 and, for the Waveney Local Plan area is 374 giving a total East Suffolk annual need of 902 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.
- 1.67 East Suffolk monitoring data for 2021-22 has recorded 499 completed dwellings in the former Suffolk Coastal area and 323 completed dwellings in the former Waveney area. Therefore, 822 new homes were completed in East Suffolk in 2021-22.

LPA	Number of homes required				Number of homes delivered				2022 HDT result
	2019-20	2020-21	2021-22	Total	2019-20	2020-21	2021-22	Total	
East Suffolk	833	581	902	2,316	832	715	822	2,369	102%

Figure 12 2022 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)

- 1.68 The forecast 2022 Housing Delivery Test result for East Suffolk is over 100%. It is not anticipated that any adjustments to the homes required will be made for the 2021/22 year as there were no lockdowns in place over that time.
- 1.69 A 95% result or higher will mean there is no requirement to produce a Housing Action Plan or to take any other measures. The Council has made a commitment to produce an annual Housing Action Plan for the East Suffolk local planning authority area, regardless of the results of future annual Housing Delivery Tests, as a means of monitoring progress on actions and outcomes around housing delivery and ensuring that it is actively supporting planned housing delivery and the implementation of the Local Plans.

Identifying issues across East Suffolk

1.70 The 2020 and 2021 Housing Delivery Test Results for East Suffolk achieved 109% and 107% respectively. However, the housing completion figures for Suffolk Coastal and Waveney fell below the housing delivery target of 916 dwellings set in the Local Plans (Suffolk Coastal Local Plan is 542 and the Waveney Local Plan is 374). 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 globally of the Covid-19 pandemic.
- Global supply chain issues.
- Global and national increased demand and cost of building materials.
- Increasing energy prices.
- This rising cost of living and the unknown impact on the economy and housing market.
- The impact of Brexit, particularly on the availability of skilled labour in the construction industry.
- There is also 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.
- The housing product produced by some volume housebuilders can only be absorbed into the housing market at a certain rate without affecting local house prices. Builders of homogenous house types will therefore only build at a certain rate, regardless of the number or size of sites allocated or inducements to increase speed of delivery.
- Difficulty in attracting a range of housebuilders to the area.
- Possible delays in housing delivery due to the timing of infrastructure projects (such as the Gull Wing bridge and flood improvement measures in Lowestoft).

1.71 Several of the challenges facing East Suffolk in 2022 are ongoing and uncertainty including global supply chain issues, rising demand of cost of building materials, increasing energy prices and growing cost of living crisis. The long-term impacts on the economy, construction industry and housing market in the coming years are currently unknown.

2 Analysis of national and international issues affecting Housing Delivery

Introduction

- 2.1 In recent years builders and developers have faced a number of challenges that affected the construction industry such as the Pandemic, BREXIT, the Suez Canal crisis, an increased national demand for materials arising through HS2 (High Speed 2 rail link) construction, and an increased demand for construction from householders (for extensions and home offices). However, due to changes in Stamp Duty, Government legislative support (Business and Planning act 22nd July 2020) and changes in work/lifestyle, demand for housing remained high. These issues are detailed in the 2021 Housing Action Plan.
- 2.2 In 2021-22 builders and developers continue to face ongoing issues from the pandemic, global supply chain problems, and an increased demand for, and cost of building materials. Builders and developers also face rapidly increasing energy prices that affects material prices and onsite construction costs. There is also a growing cost of living crisis that will have an unknown impact on the housing market.
- 2.3 Information on issues affecting housing delivery comes from news, research, information provided as part of the annual housing land supply survey and from information provided by East Suffolk's Building Control Officers.

The ongoing global impact of the Covid-19 pandemic

- 2.4 The Covid-19 virus caused a global pandemic and the UK Government responded to the emergency by introducing national lockdowns, social restrictions, geographical tiered social restrictions/lockdowns, using track and trace systems and rolling out a national Covid-19 vaccination programme. Inevitably, such measures impacted the construction industry and the economy more widely and it is therefore important that these are considered in the Housing Action Plan. At the time the 2020 Housing Action Plan, and to an extent the 2021 Housing Action Plan, was prepared there was considerable uncertainty over the short, medium and long term impacts. The construction sector was largely able to operate within the restrictions.

- 2.5 The Housing Land Supply survey results and East Suffolk’s Building Control Officers have not reported any construction sites being closed since the first lockdown in March-June 2020. Builders, contractors and developers appear to have been working consistently since June 2020 on sites of all sizes. However, throughout 2021 a number of significant related issues were being reported including delays in material availability, costs of materials and the ‘pingdemic’ whereby large numbers of the workforce had to isolate. These issues were reported in detail up to July 2021 in the 2021 Housing Action Plan. The issues continued throughout autumn 2021.
- 2.6 East Suffolk Council’s Building Control officers have provided local knowledge of how the construction industry is performing. In May 2021 Building Control Officers noted that site progress has been slower in some cases due to lag times on material orders or merchant product availability. By the end of July 2021 Building Control Officers witnessed reduced availability, unprecedented material prices, and changes in staff availability. Timber products and sheet material increased by 40-50%, the availability of cement and plaster fluctuated and increased from £5-6 to £9 per bag, and steel increased from £600- 700 per tonne to over £1,000 due to global and national shortages. The trace and trace system resulted in people being required to isolate which led to further supply chain issues with production shutdown and stores closed, and issues with staff availability onsite during construction. Building Control officers observed some developers attempting to adapt to shortages of building materials and staff availability. Building Control officers have also reported that some developers were delaying development while waiting for staff to recover from covid, rather than source more expensive replacements.
- 2.7 In September 2021 the BBC reported on building supply shortages with prices increasing and delays. The BBC reported the restoration of the pier at Shotley in Suffolk was hampered by supply issues. The BBC quoted Rico Wojtulewicz, the head of housing and planning at the House Builders Association saying “It is terrible. We are seeing such huge shortages of all sorts of materials, massive delays, a lack of any ability for builders' merchants to replenish their stock, prices are going up, projects are being delayed, contracts are not being met. "This year we've seen a 20% inflationary rise on the cost of materials and the difficulty is there are so many people competing for these materials.”²⁴ Rico Wojtulewicz considered the situation the result of increased demand for building projects during the pandemic and the reduced ability of firms to produce and deliver their products. He believed the situation will improve in 2022.
- 2.8 In September 2021 the Eastern Daily Press reported tradesmen having major concerns over increasing material costs which they are forced to pass onto customers. It was noted that some projects had increased by 20-30% in price due to material costs and customers were

²⁴ www.bbc.co.uk/news/uk-england-norfolk-58462451

put off carrying out work due to the price increases. The newspaper reported there was a lack of delivery drivers and issues at factories with staff having to isolate, causing additional problems. It was also claimed that builders' merchants were not willing to sell some materials such as cement to small businesses and were hoarding supplies for big companies²⁵.

- 2.9 In November 2021 RICS reported material cost increases had reached a 40 year high due to a number of complex factors including increased global demand for construction materials, impacts of pandemic and logistical issues. RICS considers the issues were exacerbated by Brexit that affected labour availability combined with an increased demand from people working at home and reassessing their housing needs, a strong domestic housing market and large infrastructure projects such as HS2. RICS also notes there was a drop in construction productivity in summer 2021 due to the impact of tradesmen self-isolating under the Trace and Trace system²⁶.
- 2.10 RICS analysed the BCIS General Building Cost Index and found costs in January 2022 were significantly higher than the previous year. RICS noted specific price increases for timber, steel sections, and steel for reinforcement in September 2021. British Steel added a temporary surcharge on to the price of steel due to rising energy costs. Increasing reliance on timber imports at a time when some timber-producing countries are implementing log export bans. Since February 2021 brick deliveries to the UK have been delayed causing increased prices and supply shortages.
- 2.11 James Fiske, Director of BCIS, commented: "The cost of materials in constructing a 3-bedroom semi-detached house (average area of 3-bedroom semi-detached house 88.52m²) has increased by 14% or approximately £7,300 between January and September 2021²⁷."
- 2.12 Construction News reported in January 2022 that materials prices were flat for the first time since September 2020. Nevertheless, steel was 66% more expensive than in November 2020 and planed wood was 52.4% more expensive than January 2021.²⁸
- 2.13 East Suffolk Building Control officers reported that October 2021 saw the biggest onsite construction delays caused by material shortages and supply delays. By Spring 2022 Building Control officers reported access to building materials was no longer a problem locally for developers.

²⁵ www.edp24.co.uk/news/housing/builders-warn-over-price-hikes-and-delays-8311716

²⁶ www.rics.org/uk/news-insight/latest-news/news-opinion/construction-materials-cost-increases-reach-40-year-high/

²⁷ www.rics.org/uk/news-insight/latest-news/news-opinion/construction-materials-cost-increases-reach-40-year-high/

²⁸ www.constructionnews.co.uk/supply-chain/material-prices-level-out-for-first-time-in-a-year-12-01-2022/

Increasing energy prices

- 2.14 Rising energy prices in early 2022 are causing the price of energy intensive building material and onsite construction costs to rise further. The production costs of steel, concrete, cement, bricks, copper and aluminium are all rising.²⁹ Onsite construction costs are also rising as sites use significant amounts of electricity.³⁰ From the 1st April 2022 the construction industry will no longer be entitled to use rebated gas oil / 'red diesel' which benefited from a 47p a litre duty exemption.³¹
- 2.15 Energy prices have been capped for houses until April 2023 but there is no price cap on energy for businesses. The Energy Bill Relief Scheme will provide business owners some financial support from 1st October 2022³² for six months.

The rising cost of living and the unknown impact on the economy and housing market.

- 2.16 Rising prices are impacting the profits and viability of construction companies. Insolvencies of construction companies nationally rose in 2021 and by February 2022 were 22% higher than before Covid.³³
- 2.17 In October 2021 Norwich building firm Tailored Construction Ltd went into liquidation³⁴. The Eastern Daily Press reported the company claiming it went into liquidation due to difficult trading conditions, rising material prices, the company getting too big too fast and two jobs that it failed to make profit on³⁵.
- 2.18 Building Control Officers believe that the pressures are pretty consistent for all construction companies, but the larger developers have been far more in control of their site operations due to the ownership and management of their development.

²⁹ www.ft.com/content/2dbbd373-8764-4e59-bf1f-7fa385846847

³⁰ www.ft.com/content/2dbbd373-8764-4e59-bf1f-7fa385846847

³¹ www.crownoil.co.uk/news/red-diesel-tax-changing-april-2022/#:~:text=Industries%20and%20uses%20exempt%20from%20the%20changes%20to,and%20maintenance%20vehicles%20that%20run%20on%20rail%20tracks

³² www.gov.uk/government/publications/energy-bills-support/energy-bills-support-factsheet-8-september-2022#support-for-businesses-and-non-domestic-properties

³³ www.ft.com/content/2dbbd373-8764-4e59-bf1f-7fa385846847

³⁴ <https://find-and-update.company-information.service.gov.uk/company/07302189/filing-history>

³⁵ www.edp24.co.uk/news/housing/tailored-construction-norwich-liquidation-8666602

3 Housing Delivery Analysis

Introduction

- 3.1 Local housing delivery is affected by numerous local issues that can determine when development starts on site and the speed at which housing on site is delivered. Some issues relating to the housing market, site conditions, land ownership, availability of local house builders, and the phasing of developments is beyond the influence of the Council. However, the Council's Planning Service plays a key role in supporting housing delivery through efficient determination of planning applications, negotiation of S106 agreements and through the preparation of planning policy documents.
- 3.2 As reported in previous Housing Action Plans, in addition to two new Local Plans, East Suffolk Council has several initiatives, at various stages of development, to improve planning procedures and processes. The Local Plans are however the Council's primary tool for delivering new housing strategies and site allocations. The Local Plans, particularly the Waveney Local Plan, mark a significant change in spatial strategy and approach to site allocations. It is reasonable to expect the Local Plans to have a significant impact on housing delivery during the plan periods.

The number of dwellings starting construction

- 3.3 The number of dwellings that start construction are known through reports made to East Suffolk Building Control, Private Inspectors and 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.
- 3.4 The number of homes that start construction impact the homes completed and future Housing Delivery Test results.

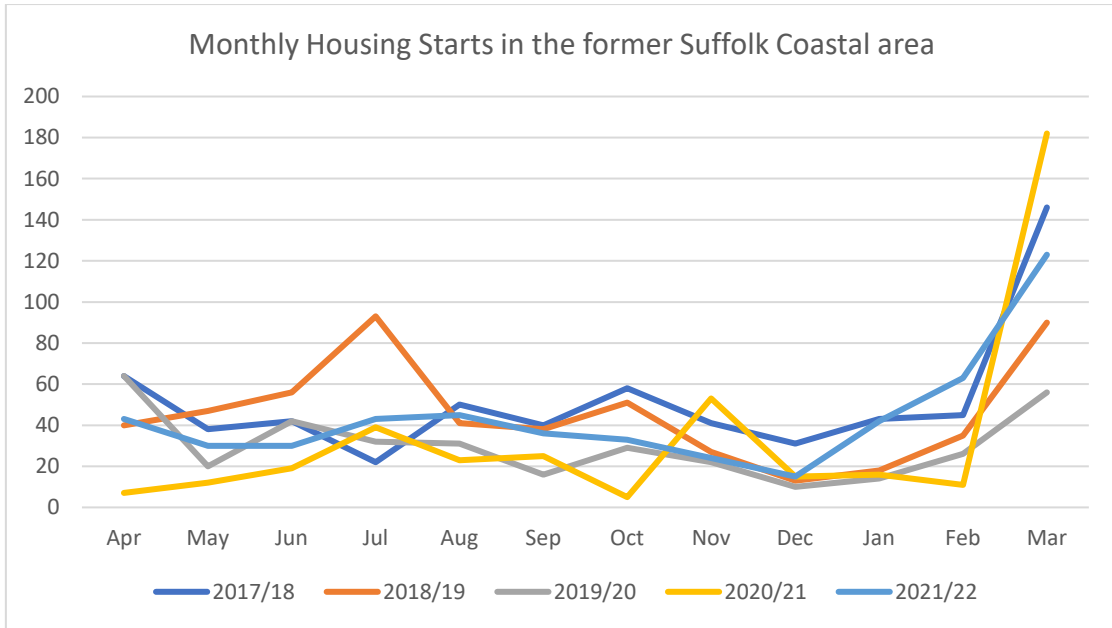


Figure 15 Monthly housing stars on site in the former Suffolk Coastal area

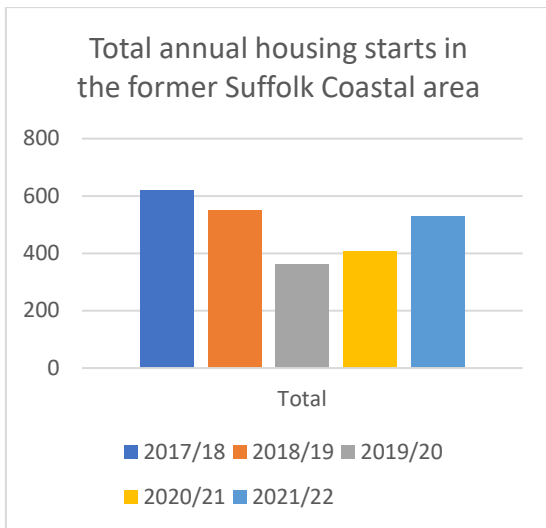


Figure 16 Total annual housing starts

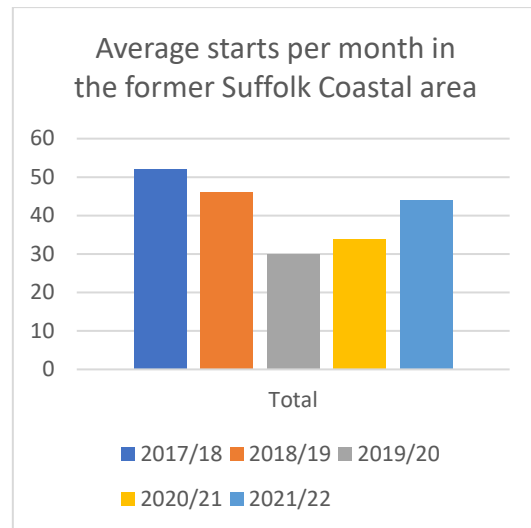


Figure 17 Average housing starts per month

3.5 Planning Officers conduct site visits at the end of the financial year to accurately record housing delivery figures. Homes that previously started construction earlier will be noted during the site visits giving the skewed impression that more homes started construction in March.

3.6 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. The number of new of homes starting construction in the former Suffolk Coastal area remain lower than pre-pandemic 2019/20 levels but are starting to increase. The low rate of housing starting construction on site could indicate lower delivery rates in the short-term.

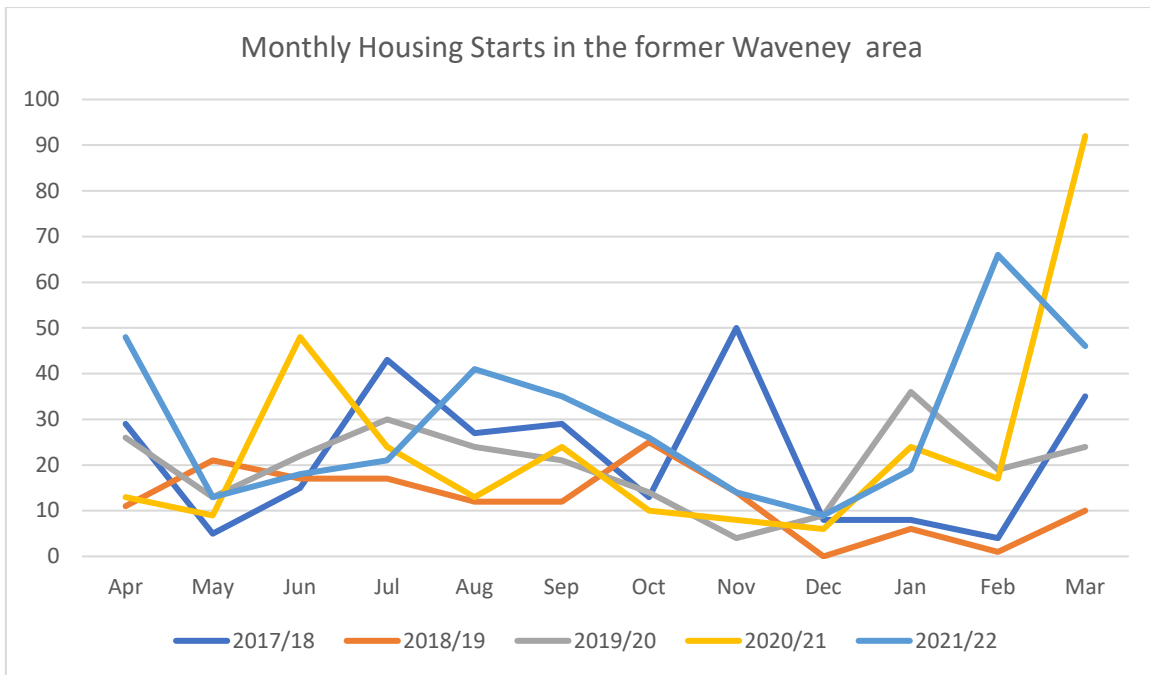


Figure 18 Monthly housing starts on site in the former Suffolk Coastal area

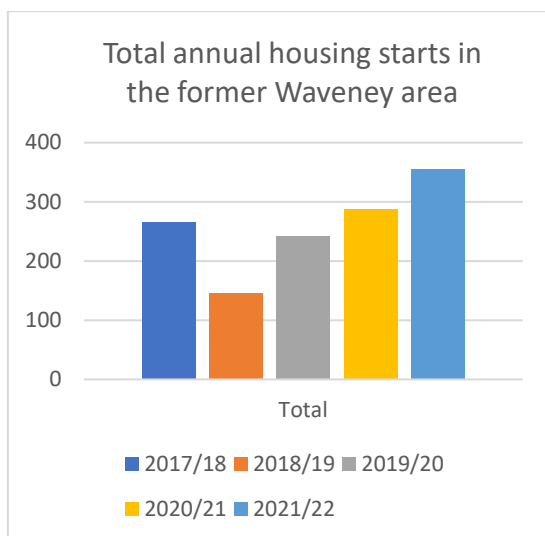


Figure 19 Total annual housing starts

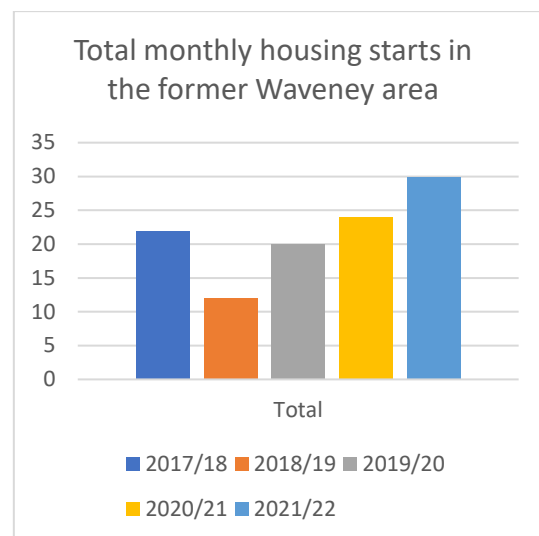


Figure 20 Average housing starts per month

3.7 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 have been increasing in the former Waveney area since then. We would expect starts on site and the delivery of homes to continue to increase as allocated sites are brought forward for development.

Number of applications being received and validated by East Suffolk

3.8 Since the start of the pandemic the number of applications validated by the Planning Department has significantly increased putting increased pressure on the planning service and officers.

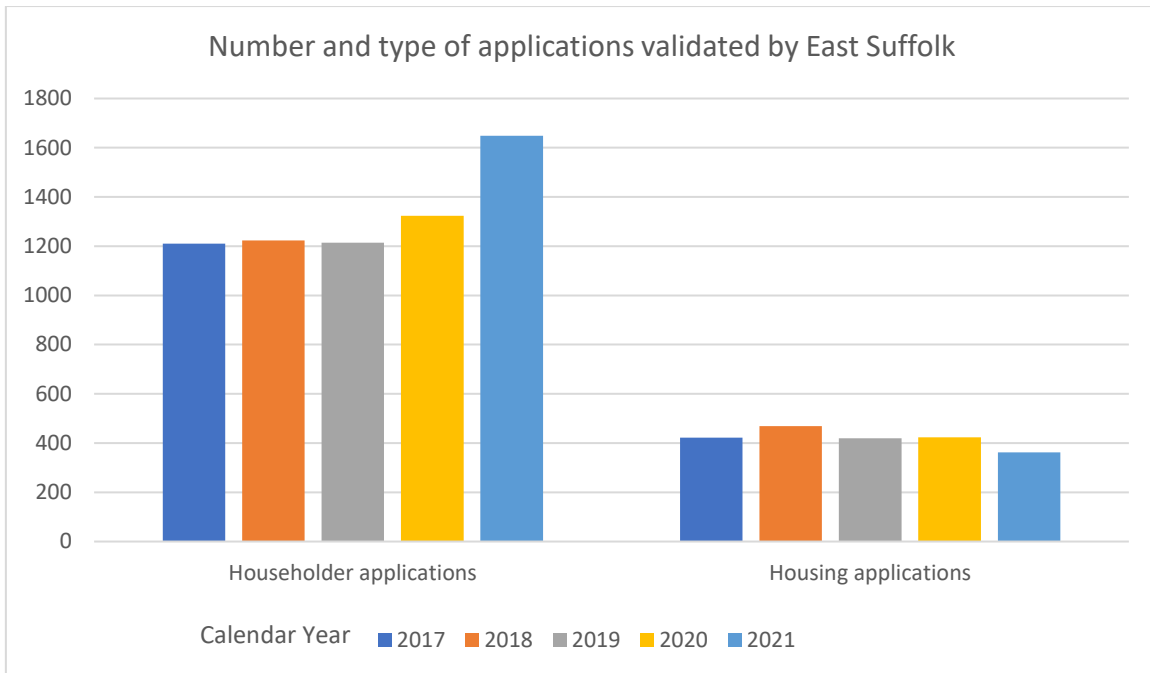


Figure 21 Number and type of applications validated by East Suffolk

3.9 The number of applications for new housing declined slightly in the calendar year 2021, but householder and other types of applications increased significantly. This has overall resulted in increased pressures and work for planning officers in development management.

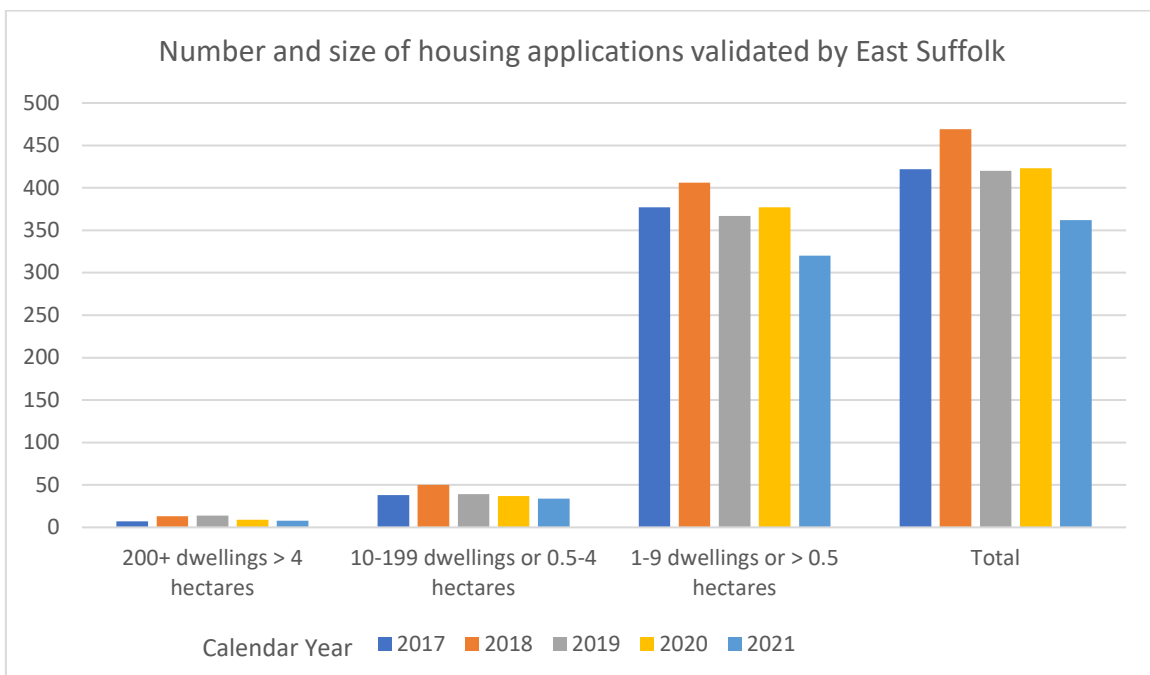


Figure 22 Number and size of housing applications validated by East Suffolk

3.10 The number of minor applications for 1-9 dwellings slightly decreased in 2021. The number of applications for 10-199 dwellings were relatively stable over the past five years. In 2020 and

2021 the number of largescale applications for 200+ dwelling were less than the previous two years.

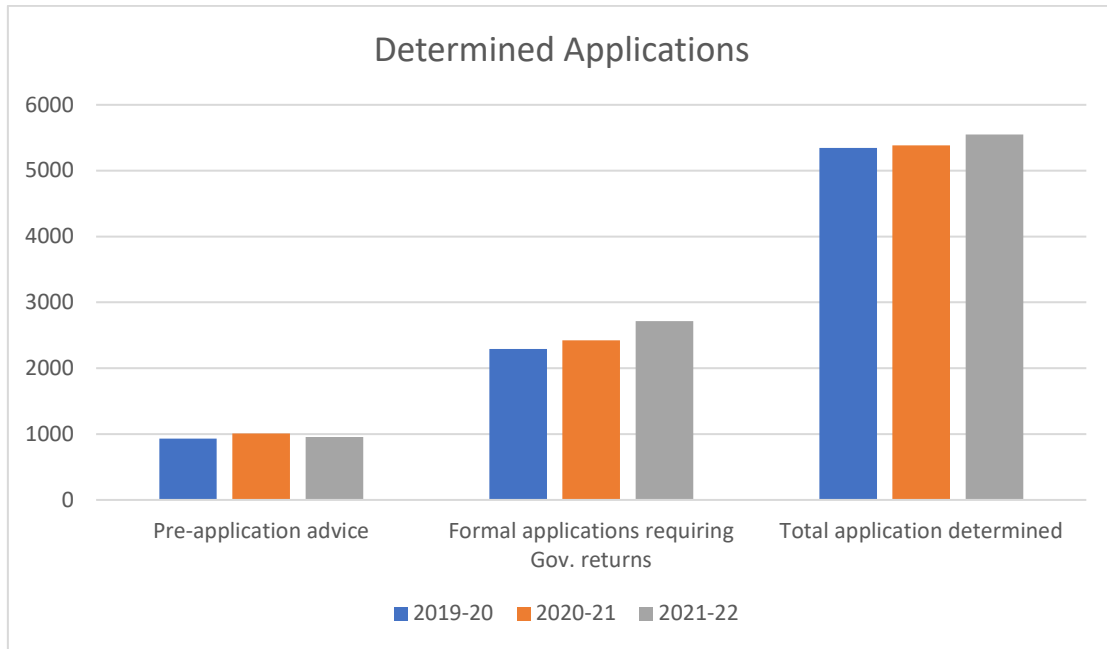


Figure 23 Number of determined applications

3.11 The total number of determined applications increased by 203 between 2019/20 and 2021/22 and all submissions take a significant amount of officer time to process and determine. The most significant increase was in formal applications requiring a government return (including Planning Applications, Listed Building Consent and Advertisement applications) which increased by 434 cases or 18.5% between 2019/20 to 2021/22.

Speed of determination

3.12 As set stated above, the Council is currently meeting Government targets in relation to the speed of determination of all planning application types.

3.13 The table below show provides details on percentage and number of planning applications determined against the National and East Suffolk Council targets.

	Percentage	Targets
Major Development	80%	60% National 65% Council
None Major Development	73.81%	65% National 70% Council

Figure 284 1st October 2020 – 30th September 2022 planning determination statistics

Analysis of time spent determining applications

- 3.14 The planning process follows a similar pattern for all applications. Pre-application advice³⁶ is not compulsory but is highly recommended for all applications. It can reduce the number and complexity of issues that need resolving during the application process, enabling quicker and more proactive decision making.
- 3.15 Planning applications must be validated to ensure that all the necessary information has been submitted and there is public consultation with statutory consultees, non-statutory consultees and neighbours notified. Additional information or minor revisions that would improve and make an application acceptable may be submitted. Large developments require a S106 agreement and developers are supported by the Council to submit and negotiate legal under-takings as early on as possible.
- 3.16 The Government has set the statutory time limit of 13 weeks for determining major developments (see definition in paragraph below) and eight weeks for all other applications. A 16 week limit applies to applications subject to an Environmental Impact Assessment.
- 3.17 For housing, any application of 10 or more units, or development on 1 hectare or more, is classed as a major development.³⁷ An extension of time can be agreed between the Council and an applicant to allow for additional information or revisions to be submitted, and for negotiating S106 agreements.
- 3.18 The data in the graph below highlights the wide-ranging amount of time it takes to determine a planning application. Household applications and minor applications (less than 10 homes or development on less than 1 hectare) are usually determined within the Government's 8 week target and major applications are usually determined within the Government's 13 week target. Where applications have taken a long time, possibly over a year to determine, it is usually due to time spent negotiating changes in the design and layout of proposals.

³⁶ <https://www.eastsuffolk.gov.uk/planning/planning-applications/pre-application-planning-advice/>

³⁷ The Town and Country Planning (Development Management Procedure) (England) Order 2010, Part 1 Preliminary, 2, <http://www.legislation.gov.uk/uksi/2010/2184/made>

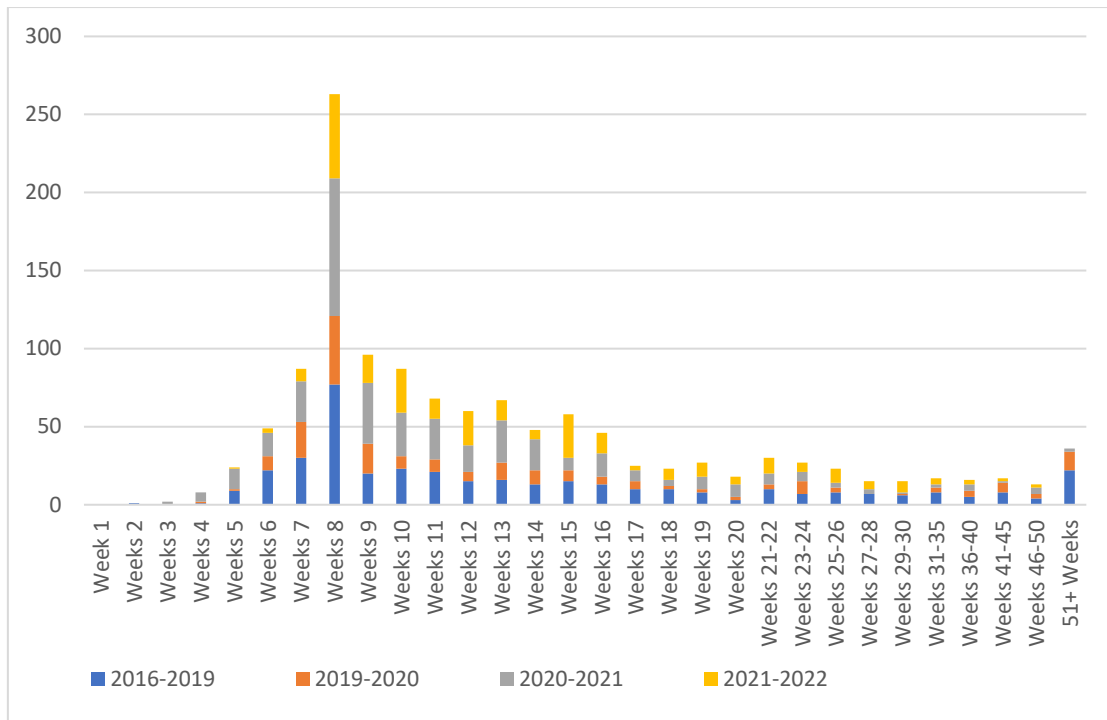


Figure 24 Length of time in weeks to determine housing planning applications in former Suffolk Coastal and Waveney areas from 1st April 2016 – 31st March 2022

- 3.19 The Development Management Team continued to operate throughout the pandemic. There is the expected spike in applications determined in advance of the eight week statutory limit, but none at thirteen weeks, 16 weeks or 26 weeks. Extension of planning application determination timescales are agreed with agents/applicants when additional time, for example to allow for amendments to applications or to seek to address consultation comments, is considered appropriate.
- 3.20 Despite changes to the type and number of applications received over the past two years during the pandemic, the time taken to process and determine applications remains at a good level. East Suffolk are still meeting the government’s targets for determining planning applications (see later section on speed of determination).

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

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

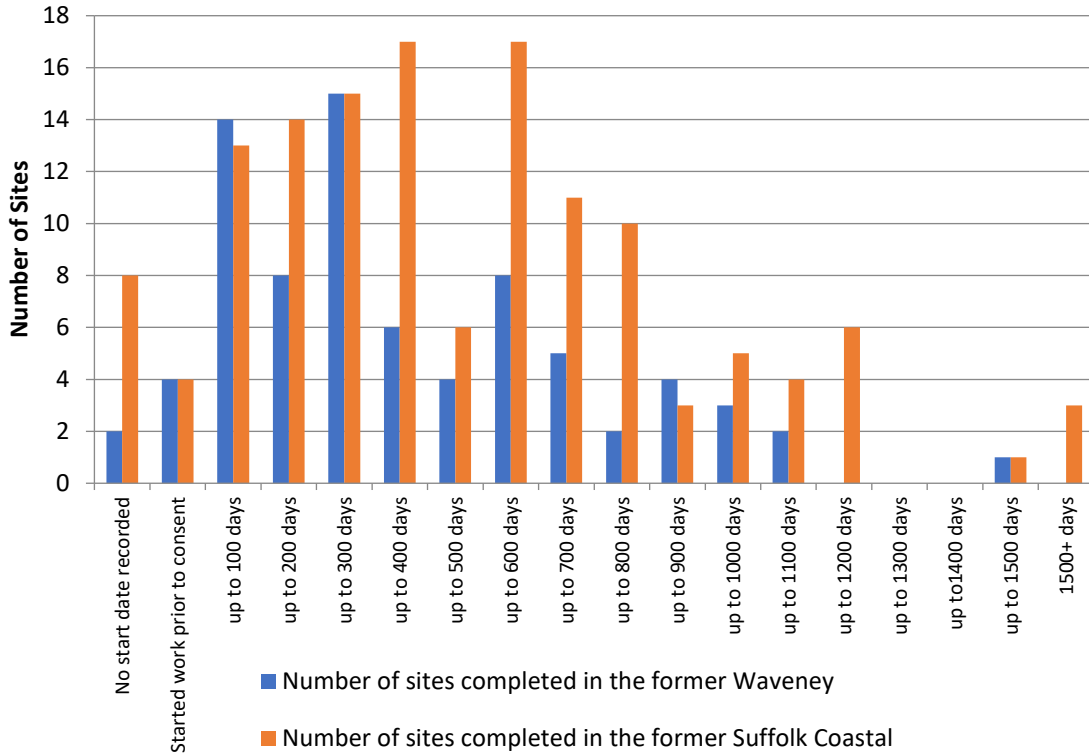


Figure 25 The length of time from consent to work starting on site for housing developments completed between 1st April 2019 – 31st March 2020

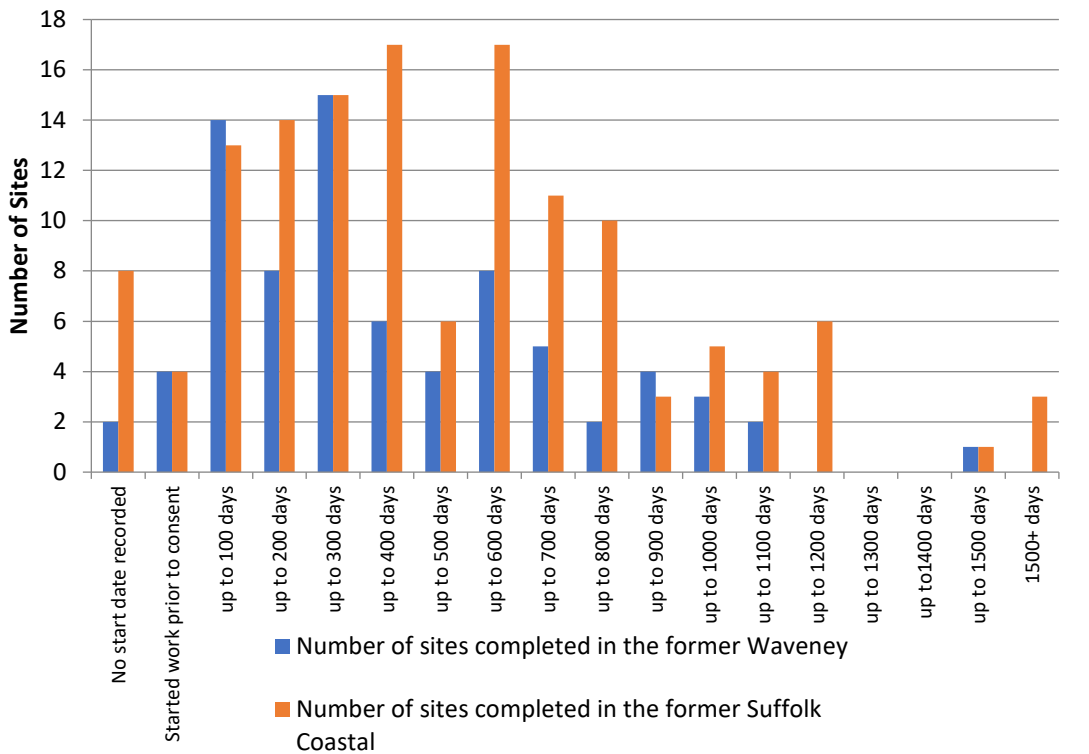


Figure 26 The length of time from consent to work starting on site for housing developments completed between 1st April 2020 – 31st March 2021

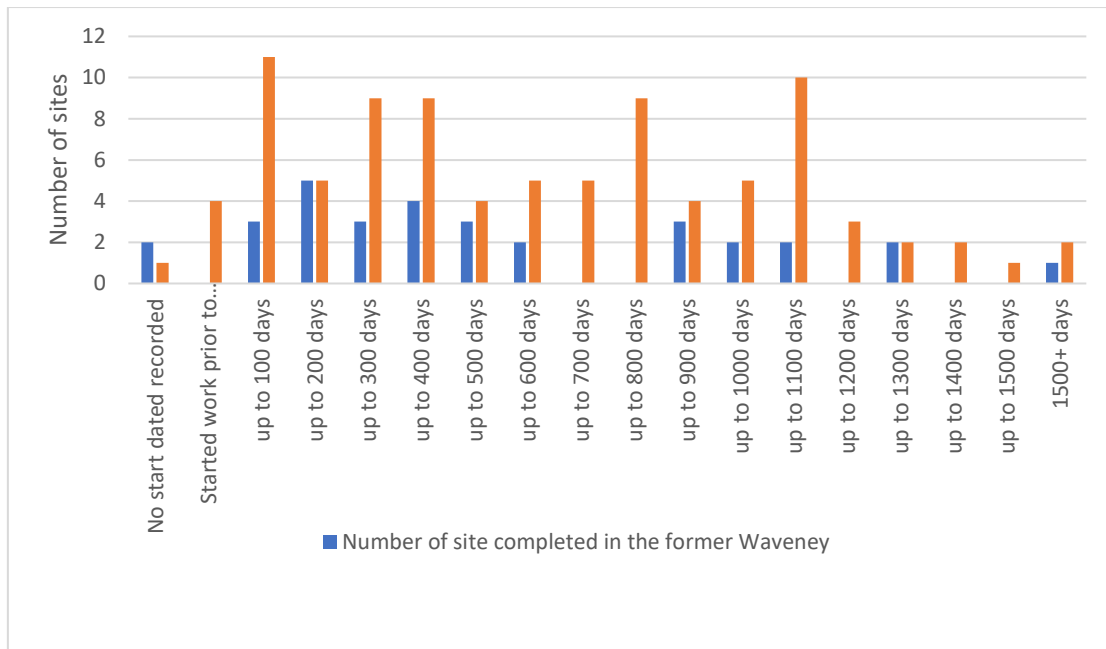


Figure 27 The length of time from consent to work starting on site for housing developments completed between 1st April 2021 – 31st March 2022

- 3.22 In the year 2019/20 50% of the former Suffolk Coastal area developments started within 390 days of consent being granted. Sites included 2 large (50-499 units) sites, 5 medium (10-49 units) sites and 130 small (0-9 units) sites. 75 of the sites are on 'greenfield' land and 62 are on previously developed land.
- 3.23 In the year 2020/21 50% of the former Suffolk Coastal area developments started within 560 days of consent being granted. Sites included 3 large sites, 7 medium sites and 86 small sites. 51 of the sites are on 'greenfield' land and 45 are on previously developed land.
- 3.24 In the year 2021/22 50% of the former Suffolk Coastal area developments started within 595 days of consent being granted. Sites included 1 large site, 1 medium site and 89 small sites. 57 of the sites are on 'greenfield' land and 34 are on previously developed land.
- 3.25 In the year 2019/20 50% of the former Waveney area developments started within 260 days of consent being granted. Sites included 3 medium sites and 75 small sites. 43 of the sites are on 'greenfield' land and 35 are on previously developed land.
- 3.26 In the year 2020/21 50% of the former Waveney area developments started within 130 days of consent being granted. Sites included 2 medium sites and 45 small sites. 18 of the sites are on 'greenfield' land and 29 are on previously developed land.
- 3.27 In the year 2021/22 50% of the former Waveney area developments started within 345 days of consent being granted. All 32 site were classed as small sites. 15 of the sites are on 'greenfield' land and 17 are on previously developed land.

- 3.28 In East Suffolk (83 sites or) over 70% of the sites developed delivered a single dwelling, highlighting the cumulative importance of small developments to overall housing delivery. While 46% of the total number of new dwellings are delivered on a small number of large sites of 50-499 units. This pattern of the site size and delivery is repeated across East Suffolk.
- 3.29 The graphs show that in 2021/22 for homes completed, the length of time from consent to work starting on site shows a more even distribution. In previous years more development started work site within a year of consent being granted and in 2021/22 work starting on site is more evenly distributed across three years from consent being granted resulting in a higher average length of time for work started on site in 2021/22. Most of the sites started construction on site within the three years.

Pre-application service

- 3.30 The Council continues to operate a pre-application service offering advice on development proposals prior to the submission of an application. The service is not compulsory but is encouraged as it leads to better quality developments and an increased chance of a quicker decision on the application.
- 3.31 There is a charge made to cover officer time applied to this service. The pre-application service enables the Council to provide an officer level response at an early stage, which for proposals which proceed to the planning application stage enables applicants to understand the information to submit alongside a planning application as well as any issues to be addressed. This potentially enables the validation and determination process to proceed more efficiently. The pre-application advice service is due to be reviewed in 2023, including the addition of collaborative arrangements with County Council consultees such as Highways and the Lead Local Flood Authority. This expansion of the service would be hugely beneficial to major housing pre-apps needing greater certainty through the overlapping consultee responsibilities and considerations.

East Suffolk Local Validation Requirements

- 3.32 The Council had previously identified an issue in relation to the varied quality of applications submitted that can cause delays at the validation process when the Council needs to request alternative or additional material.
- 3.33 The East Suffolk Local Validation Requirement list was published in October 2020. The current Validation Requirements are available to view online here:
www.eastsuffolk.gov.uk/assets/Planning/Planning-Applications/Local-Validation-Requirements.pdf

- 3.34 The Local Validation Requirements list is reviewed approximately every two years. It is due to be reviewed again and consideration will be given to any planning policies that have been impacted by recent changes to Building Regulations and the effect of information that should be submitted with planning applications.

Planning Conditions

- 3.35 The former Suffolk Coastal and Waveney planning services previously operated with separate sets of model planning conditions. It was recognised that that this could create uncertainty for regular developers and agents who submit applications across the East Suffolk area. The Council also recognised that planning conditions are particularly important given the need to agree pre-commencement conditions with applicants. Work on model planning conditions is complete and the Council now uses a single set of model conditions across East Suffolk.
- 3.36 Standard condition wording is also provided in the Sustainable Construction SPD (2022). The standard conditions cover water efficiency, the Sustainability Statement, Energy Statement, BREEAM Certificates and M4(2) home requirements.

Statement of Community Involvement

- 3.37 A new Statement of Community Involvement (SCI) was published in April 2021 that applies to both the work carried out by the Development Management Team and Planning Policy Team. The SCI provides the flexibility to enable the Council to maintain services and progress work in the event of any future social restrictions. The SCI is available to view here:
www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Statement-of-Community-Involvement/Statement-of-Community-Involvement.pdf

Section 106 agreements

- 3.38 The time taken from starting to negotiate and draft a S106 agreement until completion and signature varies significantly with no standard time frames and it is regularly cited as causing significant delay in issuing planning permissions. The speed is dependent on when the process starts in relation to other planning matters, the issues raised by consultees during planning applications, the complexity of the issues involved, and the individuals involved in the negotiations. Thanks to the introduction of S106 monitoring fees and a team comprehensively dealing with s106 and CIL, which is self-funding from CIL admin collection, this specific part of the service is well resourced and efficient.
- 3.39 The Major Sites and Infrastructure team was created in 2019, in part to better manage the S106 process. The Council has introduced the Exacom system in the last 18 months to support the S106 and CIL process enabling clearer and transparent monitoring and management of developer contributions. The Council also has a specific Planning Solicitor focussing on S106

work and a close relationship with its housing enabling team to provide support on affordable housing requirements with S106 agreements. As part of the production of its Affordable Housing Supplementary Planning Document the Council has adopted model Heads of Terms and model clauses in relation to securing affordable housing through Section 106 agreements. It is anticipated that this will add further efficiencies to the Section 106 negotiation process.

Community Infrastructure Levy (CIL)

- 3.40 Very early attention was given to CIL and the impact of the pause in house sales on developer cashflow and CIL instalments through lockdown. East Suffolk was one of the first authorities to implement measures to change instalments and pause any late payment interest, along with a pause on CIL enforcement. This caught the attention of MHCLG who discussed steps they wished to take with East Suffolk and reviewed East Suffolk's approach before the introduction of national measures. This was specifically described in the RTPi Paper - Pragmatic and prepared for the recovery. <https://www.rtpi.org.uk/media/5318/pragmatic-and-prepared-for-the-recovery.pdf>
- 3.41 Since the end of the first lockdown the CIL Team have collected more CIL payments than previous years. This indicates successful housing delivery across the district and effective implementation of the CIL charging schedule and collection of payments. The successful implementation of the CIL Charging Schedule across East Suffolk means the Council is now able to consider bids to provide important education facilities that will support the housing growth in the district.
- 3.42 The East Suffolk [Infrastructure Funding Statement](#)³⁸ (IFS) details district CIL allocations and the progress status of the projects. District CIL is allocated to a wide variety of projects. The latest IFS 2021-22 reported a variety of projects that had received CIL funding had completed included Framlingham Medical Centre, Beccles Town FC 3G Pitch, Beccles Lido and Bungay Community Centre. In progress are projects at Halesworth delivering footpaths, extending a primary school, extending Bungay High School and delivering a new nursery. These are all being delivered in advance of homes which builds public and developer confidence in housing delivery. District CIL helps deliver education, health, sport and other community needs to support the housing growth allocated in the Local Plans.
- 3.43 The CIL Team's project to digitise all CIL and S106 information and enter the data into a new software programme called Exacom is underway. The project is being undertaken by two members of staff and is due to be completed in 2022.

³⁸ www.eastsuffolk.gov.uk/planning/developer-contributions/infrastructure-funding-statement/

- 3.44 The aim of the Exacom software is to manage and monitor CIL and S106 collections and payment in the future. The new Exacom software will record and publish in a user-friendly format the amount of potential funds available for future collection, the amount due from current development, the amount collected, and the amount allocated. Exacom makes it possible to easily understand the various projects funded by CIL and S106 including affordable housing, community facilities, contributions to ecology and wildlife, education (early years, Primary schools and Secondary schools), footpaths and cycle paths, healthcare facilities, and highways improvements and many more.
- 3.45 Whilst Exacom does not directly aid local housing delivery, it provides a quick, efficient method of collecting and monitoring CIL that enables the delivery of new infrastructure projects that will support new homes across the district.
- 3.46 The Council is preparing a single East Suffolk CIL Charging Schedule (to replace the two separate CIL Charging Schedules in places for the former Suffolk Coastal and former Waveney areas). Alongside that process, an East Suffolk CIL Instalments Policy is being prepared, which allows the payment of CIL in instalments (as with the CIL Charging Schedules, there are currently two separate Instalment Policies, one for the former Waveney area, and one for the former Suffolk Coastal area). The new East Suffolk CIL Charging Schedule is currently going through examination. Further information on the CIL Charging Schedule Examination is available online here: www.eastsuffolk.gov.uk/planning/developer-contributions/community-infrastructure-levy/cil-charging-schedule/

Commuted Sums

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

Supplementary Planning Documents

- 3.48 The East Suffolk Planning Policy and Delivery Team are developing a suite of Supplementary Planning Document (SPD) that support the planning policies within the Suffolk Coastal Local Plan and Waveney Local Plan. The SPDs provide additional information and guidance that

may not increase the overall quantum of housing development but should support the delivery of housing development and/ or increase the quality of developments. SPDs and other similar documents produced by the Council build certainty and confidence for housing developers and communities, ensuring greater commitment to plan-led homes across the District.

3.49 The SPDs that have been recently adopted or are under development are:

- Affordable Housing SPD (adopted 2022)
- Coastal Adaption SPD (under development)
- Healthy Environments SPD (under development)
- Historic Environment SPD (adopted 2021)
- Housing in Clusters and Small Scale Residential Development SPD (adopted November 2022)
- North Lowestoft Heritage Action Zone Design Guide (adopted 2020)
- Recreational Disturbance Avoidance and Mitigation Strategy SPD (adopted 2021)
- Residential Development Brief SPDs (under development/ ongoing) (Brief for site allocation WLP2.14 adopted in 2021)
- Sustainable Construction SPD (adopted 2022)

3.50 The preparation of SPDs also aligns with the Council's wider housing ambitions. The Housing service has worked closely with the Planning service to produce the Affordable Housing SPD and is currently part of the steering group on the Healthy Environments SPD.

Affordable Housing Supplementary Planning Document

3.51 An Affordable Housing Supplementary Planning Document (SPD) was adopted in May 2022. The SPD provides guidance on the implementation of policies relating to affordable housing in the East Suffolk Council - Suffolk Coastal Local Plan and East Suffolk Council - Waveney Local Plan policies. The SPD provides guidance on a range of topics including types of affordable housing, identifying an appropriate mix of affordable housing, the design of affordable housing, legal agreements and carrying out local housing needs assessments.

3.52 The Affordable Housing SPD replaces the following adopted documents:

- Affordable Housing Supplementary Planning Document (May 2012) – this relates to the former Waveney local planning authority area;
- Supplementary Planning Guidance 2 Affordable Housing (July 2004) – this relates to the former Suffolk Coastal area.

Residential Development Briefs

- 3.53 The Council created residential development briefs for ‘small sites’ allocated in the Local Plans to support the delivery of high quality design and to provide housebuilders with greater certainty regarding what was expected. The briefs should assist in speeding up the design of developments and the decision-making process.
- 3.54 The first Development Brief was adopted for [Land north of Union Lane in Oulton](#)³⁹ (WLP2.14) in September 2021. Other small sites allocated in the Local Plans are progressing without the aid of a Development Brief. The benefits of design briefs for small sites is under consideration and the need for further development briefs is being reviewed.

RAMS

- 3.55 The Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) is a joint project between East Suffolk Council, Ipswich Borough Council and Babergh and Mid Suffolk District Councils to reduce the impact of recreational use on Habitat sites caused by new residential developments in Suffolk. RAMS payments are requested for developments of one or more new dwellings and some tourism development, within a 13km zone of influence from designated sites (known as European Sites), on the Suffolk Coast.
- 3.56 The Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) Supplementary Planning Document was adopted in May 2021 and is available online here: www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Recreational-Disturbance-Avoidance/Suffolk-Coast-RAMS-SPD-final-May-2021.pdf
- 3.57 In relation to housing delivery, the RAMS SPD provides guidance for developers and applicants on the per dwelling financial contribution, including a section on how to pay, to support developers and applicants in providing their contribution to the necessary mitigation.

³⁹ www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Residential-development-Union-Lane-Oulton/Residential-Development-Brief-for-WLP2.14-Land-North-of-Union-Lane-Oulton.pdf

Rural Housing Delivery Group

- 3.58 A Rural Housing Delivery Group was established to increase the supply of rural affordable housing. It was co-ordinated by the Council's Housing Strategy and Enabling Manager and involves joint working between the Housing and Planning Services, in collaboration with Homes England.
- 3.59 The Board no longer meets, however one of the outcomes from discussions was the need for a more joined up evidence base that was available to local people. A new dashboard is being compiled detailing housing need from the Councils Gateway to Homechoice system, levels of affordable housing and housing delivery by area and housing costs at ward level. This is designed to give local people direct, easy access to such data to enable them to make informed decisions when responding to planning applications or considering rural exception sites, community led housing schemes and neighbourhood plan housing allocations. The aim is for it to be launched in spring 2023.
- 3.60 The information contained in the dashboard will be helpful to Neighbourhood Plan Groups seeking evidence of local housing need and who may wish to allocate land for housing development and other community groups that want to develop housing for local people.

Neighbourhood Plan guidance

- 3.61 The Council has produced a [Neighbourhood Planning Guidance Note, Review of Made Neighbourhood Development Plans](#)⁴⁰ that was published in January 2022. The review provides information for communities that may be considering whether to review their made Neighbourhood Plan. The Council has also produced guidance on how an indicative housing requirement will be calculated for a Neighbourhood Plan group looking to plan for more housing.
- 3.62 The Council is producing Neighbourhood Plan guidance to help deliver housing through planning policies and site allocations in plans. The guidance will provide information on various house types including self-build and custom build houses as well as the role of community led housing principles in delivering homes for local residents. The guidance is due to be published in 2023.

⁴⁰ www.eastsuffolk.gov.uk/assets/Planning/Neighbourhood-Planning/Preparing-a-Neighbourhood-Plan/Neighbourhood-Planning-Guidance-Note-Review-of-Made-Neighbourhood-Development-Plans.pdf

Self-build and Custom-Build Housing

- 3.63 The Self-Build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) places a duty to maintain a register of interest and grant suitable permissions to meet demand for self and custom build housing. East Suffolk Council has a positively planned approach to self-build and custom housebuilding in the district. The Council's Housing Enabling Strategy includes actions to support delivery of self and custom build housing. Furthermore, planning policies in the new local plans both support and require delivery of self and custom build housing. The Council is also exploring ways of directly contributing to the delivery of self and custom build housing through the Asset Management, Housing, Planning, and Regeneration teams working together.
- 3.64 The Council's website makes it possible for the public, developers and any other interested parties to access data and information connected to self-build and custom housebuilding in the district. This includes:
- An interactive map showing self/custom build plots which have been permissioned and, in some cases, are available to purchase (<http://eastsuffolk.maps.arcgis.com/apps/webappviewer/index.html?id=858a43aacbad4078b98d715dd455d28f>)
 - Key statistics from the Council's Register, including an interactive map indicating areas of interest (<https://www.eastsuffolk.gov.uk/planning/self-build-and-custom-build/key-statistics-from-the-self-build-and-custom-build-register/>)
 - An open data portal where data on the Register and self/custom build permissions can be freely downloaded (<https://data-eastsuffolk.opendata.arcgis.com/search?q=self%20build>)
- 3.65 The Council provides updates to people on the register when it becomes aware of new self-build or custom housebuilding opportunities. These measures are aimed at supporting those seeking to acquire a self/custom build plot in the district.
- 3.66 Additionally, the Council will support developers, landowners etc. who are bringing forward self or custom build developments in reaching people on the register with the aim of a mutual benefit for all.
- 3.67 Self-build opportunities provide diversity in housing delivery and contribute to reducing dependence on the small number of housing developers that operate in East Suffolk. The Council provides a constructive and supportive approach to self-build and custom housebuilding creating very positive conditions for supporting and delivering self/custom build in the district. This is borne out by the healthy supply of suitable plots which is expected to continue.

Review of the Brownfield Site Register

- 3.68 The Housing Enabling Strategy (2020-2025) aims to encourage and facilitate developers and Registered Providers in the delivery of new homes. The Council has published a Brownfield Register and the Housing Enabling Strategy confirms the Council's commitment to review the register each year (as required by national regulations) to provide up to date information on brownfield land that is available for development.
- 3.69 Information including an interactive map of brownfield sites is available on the East Suffolk website here: <https://www.eastsuffolk.gov.uk/planning/brownfield-land-register/>

East Suffolk Cycling and Walking Strategy

- 3.70 The East Suffolk Cycling and Walking Strategy was adopted in October 2022. The strategy sets out to create safe, coherent, direct and attractive cycling, walking and wheelchair environments that will facilitate good health and wellbeing and encourage more environmentally sustainable lifestyles and reduce road congestion. The strategy will support housing delivery by providing greater certainty as to the cycling and walking infrastructure needed on and around site allocations, as well as other development opportunities across East Suffolk.

Suffolk Design: Street Guide

- 3.71 Suffolk County Council commissioned Stantec to produce new design guidance for streets for Suffolk. East Suffolk Council have been working together with other Suffolk Local Authorities to help develop the Suffolk Design: Street Guide. The purpose of the Streets Guide is to ensure developments are designed with the user hierarchy in mind, with pedestrians, disabled people, and cyclists prioritised over vehicle users. The Guide provides guidance on street trees, SuDS, and refuse collection for a wholesale approach to street design. The Guide also provides an innovative approach to the creation of movement frameworks, which are expected to support planning applications as part of the design and access statement or a standalone movement framework document. The movement frameworks evidence the primary, secondary and tertiary movement routes for each user (starting with pedestrians, cyclists, public transport, and then private vehicles), thereby ensuring street design forms a fundamental part of the overall development design. Better design guidance is anticipated to result in better quality planning applications, supporting an efficient planning application process to assist in the delivery of new homes.
- 3.72 The Suffolk Design: Street Guide has been adopted by Suffolk County Council and is available on the Suffolk County Council website here:

- 3.73 www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/suffolk-design-streets-guide/

Impact of new infrastructure, investment and regeneration on housing delivery

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

New road bridge in Lowestoft

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

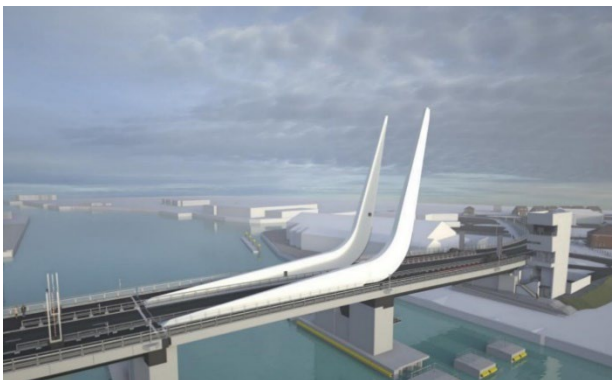


Figure 13 Lake Lothing Third Crossing image. Suffolk County Council Website July 2020 ⁴¹.

- 3.77 The new bridge is named the Gull Wing and is being delivered by Suffolk County Council and built by Farrans Construction. The bridge is due to be completed in 2023. More information is available here:

gullwingbridge.co.uk

⁴¹ <https://gullwingbridge.co.uk>

- 3.78 The completion of the new bridge will be a boost to the Lowestoft economy and support the delivery of significant housing growth in and around the town. The new bridge will particularly benefit the regeneration of Lowestoft's largest brownfield site, the Kirkley Waterfront and Sustainable Urban Neighbourhood (allocated site WLP2.4).
- 3.79 A new road has been completed to the west of Suffolk County Council 's and East Suffolk Council's Riverside Offices. The opening up of the Kirkley Waterfront and Sustainable Urban Neighbourhood brownfield site with a new access road is a considerable advantage in enabling mixed use development on that site to come forward.

Flood Defences in Lowestoft

- 3.80 Lowestoft is considered to be at risk of tidal flooding between the Outer Harbour and the western end of Lake Lothing at Mutford Lock. In December 2013 a tidal surge flooded over 160 properties and caused significant disruption to road and rail networks. In July 2015 Kirkley Stream flooded following extreme rainfall affecting 30 nearby homes.
- 3.81 The Lowestoft Flood Risk Management Project has developed a strategy to protect homes and business by reducing the risk of flooding from the sea, rivers and extreme rainfall. The project will support the economic growth and regeneration of the town by significantly reducing the risk of flood for 100 years.⁴² Sites allocated in the Waveney Local Plan for housing and employment in central Lowestoft, will benefit from the town's reduced risk of flooding and the encouragement this will provide for investment.
- 3.82 The Department for Environment, Food and Rural Affairs (Defra) has awarded £43 million for the flood defences in Lowestoft. This is the largest single award from a £170 million national funding pot being divided between 22 flood defence projects across the UK.⁴³
- 3.83 The first flood defence works started on 27th July 2020 for approximately eight weeks. The works involve constructing a sheet piled flood defence wall approximately 300m long from the open space near Bloodmoor Road to behind the gardens of homes on Aspinall Close along Kirkley Stream.⁴⁴ Works also include construction of a pumping station that will be adopted by Anglia Water. The works will protect homes in Aldwyck Way and Velda Close.
- 3.84 In May 2021 the Lowestoft Flood Risk Management Project launched a virtual visitor centre that will remain open through the duration on the project. The virtual visitor centre provides people with the latest information on the on-going works. The visitor's centre is available here:

⁴² <https://www.eastsuffolk.gov.uk/news/once-in-a-century-opportunity-for-lowestoft-secured/>

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

⁴⁴ http://lowestoftfrmp.org.uk/media/1370/2020-06-26-letter-to-residents-start-construction_.pdf

www.lowestoftfrmp.org.uk/consultations

- 3.85 The works to the inner harbour tidal defences are underway. Flood gates have been installed in the port entrance and works are taking place on Hamilton Road. As part of the tidal flood walls the footpath on the port side of Waveney Road will be closed until spring 2023.⁴⁵ The flood defences are planned for completion in spring 2026.⁴⁶

Lowestoft Town Centre Masterplan

- 3.86 The Lowestoft Town Centre masterplan was approved by East Suffolk Council in June 2020 and informs the future regeneration of the town centre. The masterplan presents itself in the context of the changes in the way people shop and spend their leisure time and the impact of the Covid-19 pandemic. The masterplan sets a clear vision and aspiration for the town centre, giving confidence to businesses, funders, consumers, and investors in Lowestoft. The strategy includes improving the overall appeal of the town centre as a place to live, as well as shop, work and spend leisure time.
- 3.87 The masterplan includes the regeneration of numerous sites across Lowestoft that could provide new homes as single use or as part of mixed-use development of a site. Clapham Road car park is proposed as a new mixed-use care/retired living facility. 18 Bevan Street East/ Denmark Road offers the opportunity for leisure/restaurants and up to 8 new homes. The former hospital site is proposed for a mixed-use development including a care facility, new homes, a shop and new public park. The former Tesco site is proposed for apartments and new mews houses.
- 3.88 The Lowestoft Town Centre Master Plan is available to view here:
<https://www.eastsuffolk.gov.uk/business/regeneration-projects/lcm/>

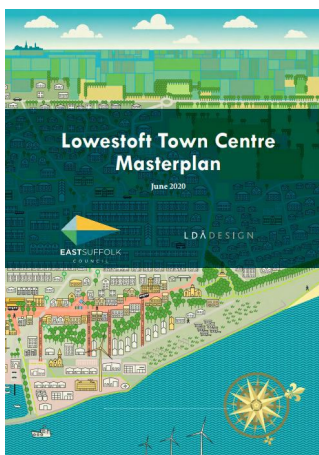


Figure 14 Lowestoft Town Centre Master Plan June 2020

⁴⁵ www.lowestoftfrmp.org.uk/assets/img/1634387.pdf

⁴⁶ www.lowestoftfrmp.org.uk/assets/img/1434404.pdf

Lowestoft Town Investment Plan

- 3.89 The investment plan sets out an ambitious 10 year plan that aims to drive real change through investment in land use, economic assets, cultural assets, skills and enterprise infrastructure. The investment will act as a catalyst for attracting further funding and investment from both the public and private sector.
- 3.90 The investment plan details 11 key objectives including:
- To improve the quality, sustainability and range of housing stock, futureproofing housing demand.
 - To increase long term employment opportunities, including higher skilled jobs that raise aspiration.
 - To provide a town which retains and attracts young people to work and live.
- 3.91 Developed by East Suffolk Council in partnership with The Lowestoft Place Board, the investment plan was a key component in successfully securing a £24.9 million ‘Towns Deal’ for Lowestoft. The towns deal will be delivered between 2022 and 2026 and consists of 5 key projects, these projects will deliver transformational change as well as providing new jobs and growth to the town.
- 3.92 Details of the Lowestoft Investment Plan is available to view here:
www.eastsuffolk.gov.uk/assets/Business/Regeneration-projects/Lowestoft-Investment-Plan/Lowestoft-Town-Investment-Plan.pdf

Leiston Town Centre Masterplan

- 3.93 High-level concept designs for the future of Leiston town centre are due to be developed as part of the [Leiston Town Centre Masterplan](#)⁴⁷ being developed by East Suffolk Council. The Masterplan will include improvements to public spaces, better connectivity between key locations and enhanced cycling and walking routes. The Masterplan will be exploring housing within the town centre area and to support the access for existing housing development within Leiston to gain better access to the Town Centre. Scheduled for completion later this year, the masterplan will be used to identify redevelopment opportunities in the town over the next 10 to 15 years and help attract investment both by public and private sector.

⁴⁷ www.eastsuffolk.gov.uk/business/regeneration-projects/leiston-town-centre-masterplan/

- 3.94 The masterplan is being delivered by LDA Design, who have been commissioned by East Suffolk Council. LDA Design bring extensive knowledge and experience to the project and recently completed a Traffic Management Strategy for Leiston, which will also inform the wider design work. East Suffolk Council are working in partnership with Leiston Town Council, Leiston Community Land Trust, Leiston Together and Suffolk County Council.
- 3.95 The key to development of a Masterplan is stakeholder engagement through workshops and discussions, which will form a key part of the project. The Masterplan will provide a clear plan and direction to create a prosperous town centre whether as a place in which to live, work or visit.

Attracting housebuilders to East Suffolk

- 3.96 East Anglia, particularly Lowestoft, has long struggled with its easterly, peripheral location and poor transport connections to other areas of England and the UK. Suffolk has no cities, no motorways and no international airports.
- 3.97 Hopkins Homes, a privately-owned property developers established in East Suffolk, has been sold to Terra Firma, a private equity investment firm. Hopkins Homes has built houses across East Suffolk and is one of largest housebuilders in East Anglia⁴⁸. The sale is expected to bring further investment into the business which should support further housing delivery. Denbury Homes, formerly Hopkins & Moore, will continue to be owned and led by the founder of Hopkins Homes and is expected to continue to grow and develop homes across East Anglia.
- 3.98 Attempts to attract a greater number and variety of housebuilders to Lowestoft or the wider East Suffolk area through invites to developer forums have not previously been successful. Prior to the pandemic, the Council held in person annual Developer Forums through which it provided information to, and sought input from, the development sector on topical planning matters⁴⁹. A virtual developers forums were held in 2021 and newsletters were published on the East Suffolk website through 2020 and 2021 to provide the development sector with up-to-date information and advice.⁵⁰ In 2022 two new major housebuilders, who have not previously built homes in East Suffolk, have engaged in development opportunities.
- 3.99 The Council will continue to invite a range of housebuilders to future Developer Forums in order to provide a forum to provide updates on the work of the Planning service and to discuss topical issues and importantly to also consider any issues that arise from the development sector.

⁴⁸ www.edp24.co.uk/news/business/20634222.one-east-anglias-largest-property-builders-sold-investment-firm/#:~:text=Terra%20Firma%20completed%20its%20acquisition,businesses%20with%20strong%20growth%20potential.

⁴⁹ www.eastsuffolk.gov.uk/planning/developers-forum/

⁵⁰ <https://storymaps.arcgis.com/collections/1437bd4c6fcd4d6983287f8e44b99f6a>

3.100 Development briefs for ‘small sites’ allocated in the Local Plans act as a tool to support high quality, inclusive and sustainable development. They can provide applicants and housebuilders with greater certainty regarding what is expected and possible on a site and therefore assist in speeding up the decision-making process. Consultation on a template for development briefs took place during June and July 2020 and the first Development Brief was adopted for [Land north of Union Lane in Oulton](#)⁵¹ in September 2021. Other small sites allocated in the Local Plans are however progressing without the aid of a Development Brief. Work supporting the development of masterplans for large, strategic sites is ongoing while benefits of design briefs for small sites is under consideration.

⁵¹ www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Residential-development-Union-Lane-Oulton/Residential-Development-Brief-for-WLP2.14-Land-North-of-Union-Lane-Oulton.pdf

4 A Review of Developments in East Suffolk

A Review of East Suffolk Council led housing developments

- 4.1 The Council has, alongside taking forward the actions in the Housing Action Plan, published a Housing Enabling Strategy which acts alongside the Housing Action Plan in guiding the Council's wider actions to support and facilitate housing delivery.
- 4.2 The Council's Housing service has ongoing work with local community groups and Parish/Town Councils to support them to bring forward their ambitions of delivering homes for local people that are affordable using the Community Led Housing Principles. Community led housing promotes meaningful engagement and consent of the community. The housing is owned or managed by the local community group possibly with the support of a Registered Provider. Community led housing is legally protected in perpetuity to benefit the local area and community.
- 4.3 The Housing Service has held two networking events for those interested in Community Led Housing principles and given a presentation to the Chairs of Community Partnerships. The Housing Service has also supported SouthGen to bring forward an exemplar scheme in Southwold that was completed March 2022 and supported the Peninsula Villages Community Land Trust (PVCLT) in their development of four affordable homes in Bawdsey which are expected to be completed early 2023.
- 4.4 The Council also adopted a Housing Development Strategy in 2020 to guide the Council's own housing developments. The East Suffolk housing programme is building momentum and projections for 2022 onwards are growing in line with numbers identified within the Housing Development Strategy and the HRA (Housing Revenue Account) Business Plan.
- 4.5 The Housing Team have incurred some programme delays due to amended strategies which are intended to better protect the council from risk, significant over spend and generate more market interests.
- 4.6 Working closely with ESC Landlord Service, the Housing Team are not only planning to deliver new homes but also looking at the long term suitability of existing accommodation. Ensuring properties are affordable to heat and comfortable to live in is a key responsibility for the service. The Housing Development Team are working on a number of redevelopment and

retro fit projects to make best use of existing assets whilst also increase numbers steadily through the addition of new homes.



Figure 29 Aerial View of proposed Deben High School development

Deben High School residential development

- 4.7 East Suffolk Council took over ownership of the former Deben High School site in Felixstowe from Suffolk County Council in November 2020. A proposal for a mixed-use site with 61 new homes built to PassivHaus standards, a community hall, leisure facility and Sports Hub was consulted on from December 2020 to February 2021.
- 4.8 The planning application (ref DC/21/0541/FUL) for the development of the site received planning permission on 3rd June 2021. The scheme has a consent for 61 new PassivHaus homes and indoor & outdoor leisure facilities. The housing element will be made up of 1, 2, 3 & 4 bedroom homes and will contain a mixture of rent, shared ownership and open market homes. The level of affordable home will be 68%, which is made up of 32 affordable rent and 10 shared ownership units.



Figure 30 Scene Block of proposed Deben High School development

- 4.9 Approximately £418K in affordable housing commuted sum payments have been committed to the development. This has enabled the development to provide a level of affordable onsite housing that exceeds the planning policy requirement of 33% affordable housing (Policy SCLP5.10 in the Suffolk Coastal Local Plan).
- 4.10 The commuted sums were collected from S106 contributions relating to three planning consents for other housing developments in East Suffolk. Some of the commuted payments in this instance need to be spent within 10 years, by 2031, and within the locality of Felixstowe.



Figure 31 Scene Block of proposed Deben High School development

- 4.11 The project at the Former Deben High School site in Felixstowe has moved into Phase 3 – Housing delivery. The demolition phase completed in December 2021. Construction was due to start in late 2021 but the proposed start on site has been postponed to early 2023 with delivery estimated between 2024/25.
- 4.12 A sales and marketing agent (W H Brown) has been appointed and will be marketing the properties throughout the construction phase. A number of launch events, including targeted days for ‘First time buyers’ and ‘An introduction to living in a PassiveHaus’ are proposed to promote the uptake of homes.
- 4.13 East Suffolk Council Officers continue to liaise with local residents and community groups regarding the progress of the development. Council Officers recently held a public engagement event on site and will continue to work with neighbouring residents to provide updates and understand any concerns they may have.



Figure 32 Scene Block of proposed Deben High School development

4.14 The concept architects (Tate Hindle) submitted the Deben scheme for the [2022 Housing Design Awards](#)^[2]. After being shortlisted earlier in the year, the scheme has won a Project Award for its design quality. The project will also be featured in the Suffolk Preservation Society's Autumn Magazine 2022.

4.15 Tate Hindle have said:

'We were delighted to receive a Housing Design Award 2022 for Garrison Lane (Deben Fields). Working collaboratively with East Suffolk Council we have designed a highly sustainable new neighbourhood that seeks to address the climate emergency, provides much needed new homes and leisure facilities for the area and improves health and wellbeing for residents and the wider community. We look forward to the next exciting chapter of the Council's housing programme as work starts on site next year.'

Strategic sites in East Suffolk

4.16 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

4.6 ^[2] https://hdawards.org/schemes/?_sft_scheme_year=2022

involve a lot of preparatory work. The Council is engaging with landowners and agents, as appropriate, to support these sites in coming forward. The key projects and the progress made is detailed below.

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

The Kirkley Waterfront and Sustainable Urban Neighbourhood

- 4.18 The Kirkley Waterfront and Sustainable Urban Neighbourhood is commonly referred to as the Lake Lothing site and is allocated under Policy WLP2.4 in the Waveney Local Plan. The allocation is the largest brownfield site in Lowestoft located in the heart of the town. It is approximately 60 hectares of land in multiple ownership, in various uses and containing numerous vacant industrial buildings. The allocation is for 1,380 new dwellings, a primary school, retail centre, Marine facilities, and employment land.
- 4.19 The site has outline planning permission on the westerly part for 1,180 homes, a retail centre, leisure facilities and a primary school.⁵² The easterly part of the site has been developed with new offices for Essex and Suffolk Water, East Suffolk Council and Suffolk County Council.
- 4.20 The Council is committed to the development of the Kirkley Waterfront and Sustainable Urban Neighbourhood. Representatives of various service areas in East Suffolk Council including Economic Development and Regeneration, Housing, and Planning and Coastal Management are collaborating to progress the site. East Suffolk is also actively engaging with Homes England and the various landowners. Various site development options are available and being considered following the approval of the Lake Lothing Third Crossing and Lowestoft Flood Defence scheme receiving funding. Work is currently underway on a masterplan for the site.
- 4.21 Several sheds on the site are currently being used for storage in connection with the construction of the new bridge across Lake Lothing. A new road has been provided through the proposed Kirkley Waterfront and Sustainable Urban Neighbourhood providing access the Riverside offices. The new road should encourage and support the development of the large brownfield site. The road is the first significant piece of infrastructure provided on the Kirkley Waterfront and Sustainable Urban Neighbourhood site.

⁵² Waveney Local Plan 2019. Page 55.

North of Lowestoft Garden Village

- 4.22 The North of Lowestoft Garden Village is a 71 hectares 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, north of Lowestoft. The site is allocated for 1,300 homes, a retirement community, primary school, local shopping centre, playing fields and 8 hectares of employment land. Policy WLP2.13 requires a masterplan to be prepared and adopted as part of a Supplementary Planning Document or Neighbourhood Plan.
- 4.23 Suffolk County Council (Corporate Property Division) as the landowner has commissioned a masterplan for the allocated site and a virtual public consultation was held from the 4th January to 15th February 2021 seeking feedback on the proposal before progressing to the next stage of the masterplan process.
- 4.24 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.⁵³
- 4.25 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
- 4.26 Officers in the Major Sites and Infrastructure Team and Planning Policy Team have been engaging with Suffolk County Council, as the site landowner, to bring forward the development of the North Lowestoft Garden Village. The site is now expected to be developed sooner than expected.
- 4.27 As part of the County Council's ambitions to deliver homes they have now established a joint venture for this site, and their other development sites across Suffolk, with Lovell Homes. It is understood that Lovell Homes will take a more active role at the planning applications stage and will be responsible for taking forward reserved matters applications.

Beccles and Worlingham Garden neighbourhood

- 4.28 The Garden Neighbourhood is an almost 90 hectares site to the south of Beccles and Worlingham. The site is allocated under Policy WLP3.1 in the Waveney Local Plan for 1,250 new dwellings, a retirement community, primary school, country park, community hub (with convenient store and community centre) and 5 hectares of employment land.

⁵³ www.northoflowestoft.co.uk/faqs/

4.29 Planning Policy WLP3.1 requires a detailed masterplan for the whole site to be informed by the outline masterplan provided by East Suffolk Council and ongoing engagement with the community. The outline masterplan for the whole site is available online here:

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



Figure 32 Beccles and Worlingham Outline masterplan

- 4.30 The site is in multiple ownership. The Council is liaising with the different landowners and developers involved. More recently the two major landownership areas have actively been working together on early masterplan influences and on infrastructure planning.
- 4.31 Larkfleet Homes, the developer for the west portion of the site have held a public consultation on their proposals for the site. Larkfleet's public consultation finished on 8th June 2021.⁵⁴ However this consultation was not of the form or nature expected of a Garden Neighbourhood. Recently Larkfleet Homes was sold to Allison Homes, but the site has been retained as an asset of Larkfleet Group who will continue to take the site forward.

Land South of The Street, Carlton Colville/ Gisleham

- 4.32 The site in Carlton Colville and Gisleham is almost 55 hectares. The site is allocated under planning policy WLP1.26 in the Waveney Local Plan. The policy allocates the site for 900 new dwellings, a retirement community, primary school, country park, allotments, flood mitigation and local shops. The site remains undeveloped and no masterplanning has commenced yet.

⁵⁴ www.eadt.co.uk/news/local-council/larkfleet-plans-for-950-new-beccles-homes-7985762

Brightwell Lakes

- 4.33 The Brightwell Lakes site near Martlesham was granted outline planning permission in 2018 by the former Suffolk Coastal District Council and has recently been purchased by housebuilder Taylor Wimpey. The development is a strategic site in the Suffolk Coastal Local Plan and provides for up to 2,000 new homes, employment, school, sports facilities, a park and other community uses.
- 4.34 The Major Sites and infrastructure Team have engaged with Taylor Wimpey on the design and to progress the development. Taylor Wimpey plan to deliver the site in phases and the first two phases are subject to a Reserved Matters Planning Application due to be submitted in summer 2021. Taylor Wimpey will be delivering significant amounts of infrastructure upfront include major roads through the development connecting the school to Ipswich Road. Taylor Wimpey's first phase is expected to deliver 317 homes, public space and allotments, roads, footpaths and cycle routes.
- 4.35 Two teams of builders will develop separate parcels of land in parallel, each with their own style and design. Each team of builders is expected to deliver 60 dwellings a year, a total of 120 dwelling a year for the next 17 years from 2024. The East Anglian Daily Times have reported that the first homes will be available in February 2024 and the first phase of 122 home includes 34 affordable properties.⁵⁵

North Felixstowe Garden Neighbourhood

- 4.36 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 Phase 2 has been received.
- 4.37 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. A recent report to Full Council has agreed for £1.5million of Council funding to progress masterplanning of the site and planning submissions. As part of that East Suffolk has recruited a 'Development Enabling

⁵⁵ www.eadt.co.uk/news/housing/date-for-brightwell-lakes-martlesham-homes-8907884

Lead' and 'Engagement Officer' through the excellent Public Practice organisation. This places associates under their programme from a private sector background in temporary roles in Local Authorities to deliver on planning and housing opportunities. In this instance, both Public Practice associates will take a lead role in progressing the North Felixstowe Garden Neighbourhood masterplan, working with consultants, stakeholders and communities. A first stage of masterplan public engagement is planned for summer 2023.

South Saxmundham Garden Neighbourhood

- 4.38 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.
- 4.39 Pigeon Investment have developed a masterplan and carried out a public consultation on the draft proposal that concluded on 31st January 2021.

Other sites

- 4.40 As set out above the Council is engaged in a programme of preparation of development briefs to assist smaller sites in coming forward. More generally in relation to smaller housing site allocations, the Council continues to seek to facilitate development through pre-application engagement and the determination of planning applications. To ensure continuity and an efficient determination process, it is intended that each site will have an identified internal informal 'team' involving officers from development management, policy and specialist services such as Design and Conservation and ecology, as appropriate.
- 4.41 Work is planned to evaluate sites allocated in the two Local Plans and other sites with long term consent which are within settlement boundaries. Where an allocated or consented site has made minimal or no known progress over a period of time such as no request for pre-application advice, public consultations on masterplans or submission of an application for allocations, no reserved matters submission for outline consents or no start on site for sites with full permission, work will be carried out to assess progress and identify any issues that might be impacting on housing delivery. The aim will be to work directly with landowners, agents and developers 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.

5 Key Actions & Responses

Delivering Planned Growth

- 5.1 In East Suffolk the analysis and creative thinking to improve housing delivery has taken place through the plan-making process. The Housing Delivery Test deals with historic data but the new plans, with new allocations, and a focus on Development Management resourcing to deliver will lead to a step-change in housing completions over the coming years. This is being seen to some extent already with the shift in completions from windfall sites to allocated sites (see Chapter 1 Suffolk Coastal and Waveney Local Plan section on page 19 and 21). 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.
- 5.2 East Suffolk Council has liaised with landowners, agents and developers through the production of the Local Plans to ensure that allocated sites are available for development within the plan period. There are however issues beyond the scope of the planning service that could have an impact on both the delivery of sites and the build-out rates on sites. Within this context, it should be noted that both Local Plans include a contingency above the housing requirement to provide confidence that the required number of homes can be delivered should any sites be delayed or not come forward.
- 5.3 Issues beyond the scope of the Housing Action Plan could 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.
 - Managing land price expectations and viability.
 - Possible land banking by owners or developers to increase land value or squeeze out competitors.
 - The ability of the East Suffolk area to attract a diverse range of housebuilders.

- The rise in volume housebuilders and decline of small and medium housebuilders, and the impact on housing delivery and build-out rates.

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

Actions

- 5.5 Recent and current uncertainties have shown that it is important to have up-to-date information on the housing delivery numbers and the issues affecting development in the local plan areas. The Planning Policy and Delivery Team collate data on housing completions quarterly which provide an indication of delivery. As stated earlier, the Council's Housing Enabling Strategy sets targets that are relevant to actions beyond the Planning service. Many actions have been delivered and are underway. These include action No.2 to support Neighbourhood Plan groups and Community Led Housing groups in creating effective strategies to deliver more housing, which is underway. The Bungay Neighbourhood plan with a site allocation for 70 new homes is going to referendum on 17th November 2022. Action No. 3 has been completed with the adoption of a Sustainable Construction Supplementary Planning Document. Action No.5 to support community led housing where opportunities arise is being carried out by the Housing Strategy and Enabling Manager. Action No.10 to develop and publish a Housing Action Plan and action No.12 to update the Brownfield Register annually are both being carried out.
- 5.6 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. Actions will be removed from the table in subsequent years once completed.
- 5.7 The surveys carried out in 2022 to inform the Housing Land Supply identified a few sites allocated in the Local Plans for which the Council has limited information. It has been two years since the Suffolk Coastal Local Plan was adopted and three years since the Waveney Local Plan was adopted. It is therefore considered an appropriate time to review the progress of all the sites allocated in the Local Plans. A review will enable the Council to identify any longer-term issues with housing delivery and act where possible. The conclusions and actions of the review will be reported in the 2023 Housing Action Plan.

Action (outcome to be achieved)	Success	Timescale	Priority	August 2019 Status	August 2020 Status	July 2021 Status	Nov 2022 Status	Service/ owner	Notes
Procedural									
NEW ACTION - Review of Pre-application advice service	Increased uptake of pre-application advice	2023	Medium	N/A	N/A	N/A	To be started		See paragraph 3.30. Pre-app service to be expanded to include collaborative arrangements with Suffolk County Council consultees.
Publish template Planning Performance Agreements for major sites	Swifter negotiation of PPAs and increased sign up leading to swifter decision making	2020	Low	Not started	Not started	Ongoing	Ongoing	Major Sites and Infrastructure Team	Part of the Suffolk Design Guidance Management process
Develop S106 template with standard wording for different standard scenarios that would be published on the website	Reduction in the length of delays	2021	Medium	Underway	Underway	Underway	Complete	Major Sites and Infrastructure Team	Template completed and incorporated in the Affordable Housing SPD which was adopted in May 2022.
Review of Local Validation List	Improved quality of planning applications	2023	Low	Underway	Underway	Complete	Work planned	Development Management	Previous list published in October 2020. Further work to update the Validation List due to commence and reflect changes in Building Regulations.
Policy Implementation									
Affordable Housing Supplementary Planning Document	Adoption of new Supplementary Planning Document	2021	Medium	NA	Underway	Underway	Complete	Planning Policy and Delivery	SPD adopted in May 2022.
A new Rural Housing Delivery Board including the Housing Team, Planning	Facilitate an increase in the supply of rural affordable housing.	2021	Medium	NA	Underway	Underway	Complete	Planning Policy and Delivery, Housing, & Asset Management	The Board no longer meets. Following work with local communities the need for better housing information for local communities has been identified. A

Action (outcome to be achieved)	Success	Timescale	Priority	August 2019 Status	August 2020 Status	July 2021 Status	Nov 2022 Status	Service/ owner	Notes
Department and Homes England									new dashboard is being compiled detailing, housing need from the Councils Gateway to Homechoice system, levels delivery and affordable housing by area and housing costs at ward level.
Annual review of the Brownfield register	Review of housing sites to create greater certainty for developers and speed up delivery.	2022	Medium	On-going annual review	On-going annual review	On-going annual review	On-going annual review	Planning Policy and Delivery	The Brownfield land register is available online.
The Council will embed processes to facilitate delivery of self/custom build plots across the Asset Management, Housing, Planning, and Regeneration teams.	The Council will make land with planning permission for self/custom build development available for purchase.	2022	Medium	NA	Underway	Underway	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.
Production of design / development briefs and project plans for larger sites	Clear guidance to support submission of planning applications, improved design and less homogenous housing	2019/20	Low	Not started	Underway	Underway	Long term work ongoing	Planning Policy and Delivery (Major Sites and Infrastructure)	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.

Action (outcome to be achieved)	Success	Timescale	Priority	August 2019 Status	August 2020 Status	July 2021 Status	Nov 2022 Status	Service/ owner	Notes
Develop design briefs for small sites	Clear guidance to support submission of planning applications and support for small and medium housebuilders to East Suffolk	2023	Low	Underway	Underway	Underway	Under review	Planning Policy and Delivery	Residential development brief for land north of Union Lane, Oulton adopted in September 2021. Programme of future briefs under review – a number of sites coming forward in advance of briefs being prepared.
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.	2023	Medium	NA	NA	Underway	Underway	Planning Policy and Delivery	Guidance currently being drafted.
New dashboard with information on housing need available to the public.	Dashboard being used by communities when considering rural exception sites, community led housing and neighbourhood plan allocations.		Medium	NA	NA	NA	Underway	Housing	A new dashboard is being compiled detailing housing need from the Councils Gateway to Homechoice system, levels of affordable housing in their area and housing costs at ward level will be launched in Spring 2023.
Production of policy on the spending of Affordable Housing Commuted Sum Payments	Adoption of policy on spending of Commuted Sums.	2022	High	NA	NA	Underway	Underway	Housing Strategy and Enabling service	The policy is in the final stages of preparation.

Action (outcome to be achieved)	Success	Timescale	Priority	August 2019 Status	August 2020 Status	July 2021 Status	Nov 2022 Status	Service/ owner	Notes
Monitoring and Delivery									
Develop and maintain a list of development sites	More engagement with land owners and developers and the ability to act quickly to resolve issues	2023	Medium	Underway	Underway	Ongoing	Ongoing	The Major Sites and Infrastructure Team and Policy and Delivery Team maintain a spreadsheet of major residential development being progressed.	Develop and maintain a list of development sites
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.	2023	High				NEW ACTION	Planning Policy and Delivery	New action identified for the 2022 Housing Action Plan. This work is linked to the ongoing work to maintain a list of development sites.
Resources									

Action (outcome to be achieved)	Success	Timescale	Priority	August 2019 Status	August 2020 Status	July 2021 Status	Nov 2022 Status	Service/ owner	Notes
Recruit to vacant posts across the planning service	Fill vacant posts	2023	High	NA	NA	NA	Underway	Planning	<p>This action is an expansion of actions in previous Housing Action Plans. In the 2021/22 a number of posts have been created and filled in the newly created Specialist Services team which provides expertise to support the consideration and determination of planning applications.</p> <p>At the time of writing there are vacant posts in Development Management, the Major Sites and Infrastructure Team and Planning Policy.</p>

6 Delivery and monitoring of the Housing Action Plan

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

Future Housing Actions Plans and Housing Delivery Tests

- 6.2 The construction of new dwellings includes negotiating the sale of land, the development of a design, securing planning consent, technical design and specification, securing Building Regulations consents, and construction which altogether is a time consuming process, and is also dependent on the market. It is therefore acknowledged that delivery of the Local Plans is an ongoing action, and whilst some sites will deliver housing in the short-term others will deliver in the latter parts of the plan period.
- 6.3 The two Local Plans contain realistic housing trajectories which reflect the time necessary for the new housing strategies to impact building completions, and this is revisited each year through the Housing Land Supply. This Housing Action Plan reports on some wider issues related to housing delivery including Brexit and the Covid-19 pandemic. The Government considers the construction sector to be vital to the Country's economic recovery from the pandemic and that we do not have enough homes in the right places. The Levelling Up and Regeneration Bill aims to rebalance "the housing and land markets by increasing transparency, addressing second and empty homes, and giving smaller builders greater opportunities to enter the market"⁵⁶. The bill also provides a £150 million Help to Build: Equity Loan scheme to make self and custom build homes realistic and affordable for people.
- 6.4 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

⁵⁶ www.gov.uk/government/publications/levelling-up-and-regeneration-further-information/levelling-up-and-regeneration-further-information

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.

- 6.5 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.

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