

Statement of Housing Land Supply as at 31 March 2019

Identifying a five year supply of
deliverable land for housing

Covering the Suffolk Coastal Local Plan area and the Waveney Local Plan area

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The five years covered in this assessment are 1st April 2019 to 31st March 2024.

This statement confirms that the **Suffolk Coastal Local Plan** area of East Suffolk has a housing land supply of **7.03 years**.

This statement confirms that the **Waveney Local Plan** area of East Suffolk has a housing land supply of **6.58 years**.

Introduction

1. The Government published the revised National Planning Policy Framework (NPPF) in February 2019. Paragraph 73 of the Framework requires local planning authorities to:

‘identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.’

2. East Suffolk Council was created on 1st April 2019, covering the former districts of Suffolk Coastal and Waveney. East Suffolk Council is the Local Planning Authority for East Suffolk other than the part of the District which falls within the Broads Authority area. The two areas are identified as being separate Housing Market Areas, with the Suffolk Coastal area falling within the Ipswich Housing Market Area and Waveney comprising its own Housing Market Area (as established through the Ipswich and Waveney Strategic Housing Market Assessment, 2017), and the two areas have separate Local Plans identifying separate housing requirements. It is therefore relevant that their position in relation to five year supply is considered separately, however this is presented in one statement reflecting that both areas are now within East Suffolk. This approach is consistent with the Planning Practice Guidance on Housing Land Supply (published in July 2019), which states that where a newly formed local planning authority is covered by strategic housing requirement policies adopted by predecessor authorities, these policies can continue to be used as the housing requirement for calculating the 5 year housing land supply in the areas they apply where these are less than 5 years old. Where strategic housing requirement policies, covering the predecessor authority area, are older than 5 years and require updating, local housing need should be used, where this is available (Paragraph: 025 Reference ID: 68-025-20190722).
3. The current Local Plan for the former Suffolk Coastal area comprises the Core Strategy and Development Management Policies (2013), along with the Site Allocations and Area Specific Policies Development Plan Document (2017), the Felixstowe Peninsula Area Action Plan Development Plan Document (2017) and the remaining policies of the 2001 Local Plan. A new Local Plan for the former Suffolk Coastal area is currently being prepared and is at an advanced stage, having been submitted for Examination in March 2019. This Local Plan will set a new housing requirement for the area including a strategy, policies and site allocations to deliver this. In the meantime, under paragraph 73 of the NPPF the housing requirement contained in the Core Strategy is identified as out of date and therefore the housing need

figure for the Suffolk Coastal area, as calculated following the standard methodology set out in the NPPF and the Planning Practice Guidance, is 542 dwellings per year. The calculation underpinning this figure is contained at Appendix A.

4. A new Local Plan for the former Waveney local planning authority area was adopted in March 2019, and sets out a housing requirement of 374 dwellings per year over the period 2014 – 2036, along with a strategy, policies and site allocations to deliver the housing requirement, including a contingency of approximately 12%.
5. With reference to paragraph 73 of the NPPF, the revised NPPF published in July 2018 and further amended in February 2019 has amended the definition of ‘deliverable’ to place greater emphasis upon demonstrating the delivery of sites which do not yet benefit from full planning permission and which are for ten dwellings or more, and that this will need to be demonstrated through clear evidence. The glossary to the NPPF defines a deliverable site as follows:

‘To be considered deliverable, sites for housing should be available now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) Sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.’

6. The Council has therefore placed emphasis upon understanding the deliverability of sites which fall under criterion b) above in preparing this statement.
7. The five years considered in this statement are 1st April 2019 to 31st March 2024. This statement concludes that the area covered by the **Suffolk Coastal Local Plan** has a **7.03 year supply** of deliverable housing sites and the **Waveney Local Plan** has a **6.58 year supply** of deliverable housing sites.

8. This Council has adopted a single methodology across both Local Plan areas in relation to the identification of evidence as set out below. However, the calculations themselves involve considerations appropriate to each Local Plan area, and these are therefore set out separately in the relevant sections of this Statement.
9. The Council is also producing a Housing Action Plan which will set out actions for the Council in supporting and enabling the delivery of housing, with the intention of having a positive impact on bringing sites forward for development.

Methodology

10. The calculations for the Suffolk Coastal Local Plan area and Waveney Local Plan area are set out in Chapters 3 and 4 respectively. These chapters follow the same structure. For each Local Plan area the housing requirement and the sources of delivery set out in Tables 1 and 2 respectively, with the five year housing land supply calculation set out in Table 3. Full details of sites included in the 5 year housing land supply are shown in Appendix B (Suffolk Coastal Local Plan area) and Appendix C (Waveney Local Plan area). These are categorised as per the categories of the NPPF definition explained below. Sites not considered to be deliverable within the current 5 year supply period are shown at the end of each of these Appendices. This section sets out the Council's approach to obtaining evidence to inform the anticipated rates of delivery.
11. The definition of deliverable in the NPPF sets out expectations in relation to demonstrating whether sites are deliverable. The Planning Practice Guidance on Housing and Economic Land Availability Assessment and on Housing Supply and Delivery sets out further guidance on what statements need to include and on what constitutes a deliverable site.

Sites below ten dwellings / 0.5ha or which have full permission

12. Sites which do not involve major development (i.e. are below 10 dwellings or are less than 0.5ha) and have planning permission and all sites with detailed planning permission should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years. The NPPF refers to examples of sites being no longer viable, there no longer being demand for the type of units or sites with long term phasing plans.
13. The Council's starting point for sites which fall within this definition is therefore that they are deliverable. The Planning Practice Guidance (in paragraph 3-048-20180913 and 68-014-20190722) expects the publication of certain information in relation to such sites as follows:
 - Details of homes under construction and completed each year;
 - Where delivery has exceeded or not progressed as expected, a commentary indicating the reasons for any acceleration or delays;
 - Details of the current planning status;
 - Details of demolitions and planned demolitions.

14. In relation to such sites, the Council has therefore gathered evidence on completions, commencements and number of units under construction through interrogation of the Council's monitoring system. Using a proportionate approach, for sites of five or more dwellings, the Council has also contacted landowners, developers, applicants and agents (depending on the most relevant contact for a site) through the use of a proforma (Form A, Appendix E) to obtain information in relation to recent progress, anticipated progress over the next year and next five years, any matters affecting delivery and the anticipated build out rate. This has been used alongside other knowledge such as consideration of the size of site, date of permission and whether there is a known developer to identify an appropriate build out rate for the five year period.
15. Analysis of past permissions and completions has identified that small sites take on average less than one year from grant of permission to construction starting on site, and therefore where permission has been granted but development has not started it is anticipated that development would start in Year 1 and completions are therefore anticipated from Year 2. Where sites are under construction, consideration is given to past build out rates in anticipating future delivery. Analysis of past completions also shows that small sites will generally on average complete in under two years from start on site and therefore the rate of delivery reflects this. For sites of less than 5 dwellings, any dwellings currently under construction but not completed are entered into the current year column, unless there is evidence to suggest delivery of the site has been delayed.
16. Where outline permission is granted for sites of less than ten dwellings, completions are anticipated to begin later in the plan period to allow time for reserved matters to be granted.
17. For sites with full planning permission but which are major development, build out rates have been informed by site specific circumstances including the characteristics of the site. Analysis of past completions has indicated that it is difficult to establish any firm trends in relation to completions on major sites, however for medium sites (10 – 50 dwellings) completions of around 20 dwellings per annum appear to have been achieved on average (once anomalies are removed from the data). For sites of over 50 dwellings, there is insufficient recent data for East Suffolk to identify any trends, and therefore specific consideration has been given to the circumstances of each site. It will be seen that on some larger sites, development is anticipated to continue beyond the five year period.
18. Appendices B and C list separately those sites where it is considered that there is clear evidence that they won't come forward in the five years. Consideration has been given to

any factors that would represent clear evidence that homes will not be delivered within five years in line with the NPPF definition, and an explanation is given in the relevant tables. Where development has stalled on a site for a prolonged period of time, unless evidence is available to indicate that development is to commence, it is has been judged that development will not come forward within five years. Where records show that sites are being built out at a slower rate than might be expected this is also factored into the assessment.

19. In relation to sites of 5 or more dwellings, where contact has been made with developers / agents / landowners, if any information received shows that developers are delaying building, the delivery figures have been added later in the period. If the information suggests that development is occurring sooner rather than later, then the figures can be brought forward.

Sites of ten or more units / 0.5ha or more with outline permission and allocations

20. The Planning Practice Guidance (paragraph 68-014-20190722) states that for sites with outline consent or allocated in adopted plans assessments should include information and clear evidence that there will be housing completions on site within 5 years, including current planning status, timescales and progress towards detailed permission. For sites which have outline permission for ten units or more or which are allocated (including sites allocated within made Neighbourhood Plans), the Council has sought to obtain evidence to understand the prospects for delivery of the site over the five years.
21. The Planning Practice Guidance published in July 2019 (paragraph 68-007-20190722) states that evidence to demonstrate deliverability may include:
 - current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;
 - firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;
 - firm progress with site assessment work; or

- clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.
22. To gain up to date understanding of progress in bringing sites forward, the Council made contact with relevant developers, agents or landowners in relation to these sites through use of a proforma. The proforma (Form B, Appendix E) for these sites contains additional questions (compared to that used for sites with full permission or which are not major development) such as intended timings for the submission of planning applications/discharge of conditions. The Council has made concerted efforts to obtain this information by involving officers from across the Planning service in making contact and following this up, where they have been in regular or recent contact with the agent / developer. As ultimately the decision as to whether to provide information rests with the developer / landowner, consideration has also been given to factors such as the submission of reserved matters applications and the discharge of conditions as an indication that development of a site is progressing.
23. The phasing information provided in response to this has informed the yearly anticipated build out in Appendices B and C, however a judgement has also been made as to whether the rates set out are realistic. In relation to sites falling within this category, whilst there is no firm trend analysis of past completions shows that medium sites (10-50 dwellings) deliver around 20 dwellings per annum on average (once anomalies are removed). For sites of over 50 dwellings, there is insufficient recent data for East Suffolk to identify any trends, and therefore specific consideration has been given to the circumstances of each site. It will be seen that on some larger sites, development is anticipated to continue beyond the five year period.

Windfall

24. Paragraph 70 of the Framework states that local planning authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.
25. Windfall sites make an important and reliable contribution to housing delivery in East Suffolk. Windfall development provides an opportunity for wider housing objectives to be met by enabling some housing development to come forward in other ways, for example affordable housing on exception sites, infill development, development in accordance with

the policies for housing in the countryside, subdivision of existing housing, flats over shops and development on previously developed land. These types of housing development are not expected to make a significant contribution to supply and are usually small in scale. As windfall developments are most likely to be small scale, consideration has been given to the contribution from small windfall developments (1-4 dwellings) over recent years.

26. In the Suffolk Coastal area, completions of small windfall sites over the past five years equate to an average of 97 dwellings per year. The Core Strategy and Development Management Policies (2013), and the emerging Suffolk Coastal Local Plan, anticipate 50 windfall dwellings per year, and based on average figures, the Council can be confident that at least 50 per year will continue to be delivered. In particular there are no significant changes in policy coming through in the emerging Local Plan that would be likely to have a negative effect on small scale windfall completions.
27. In the Waveney area analysis has also been undertaken of past windfall completions of the type that would be supported by policies in the Waveney Local Plan. This has identified 312 windfall completions over the past 5 years from the following sources: flats over shops; intensification sites including development on garden land; previously developed land and buildings, subdivision of housing and barn conversions. This equates to an average of 62 / 63 dwellings per annum and this is projected forwards. The policies in the new Waveney Local Plan would continue to support appropriate small scale windfall development.
28. To avoid double counting no contributions from windfall are identified in the first two years of the supply period.

Losses

29. In accordance with the Planning Practice Guidance (Paragraph 68-014-20190722), account has also been taken of any permissions which would result in the loss of residential uses, for example through conversions to other uses or through demolitions. These are set out in Appendices B and C for the Suffolk Coastal Local Plan area and the Waveney Local Plan area.

Residential Institutions

30. The Planning Practice Guidance (Paragraph 68-035-20190722) states that local planning authorities can count residential institutions in Use Class C2 in the housing land supply, and that the contribution should be based on the amount of accommodation released in the housing market. The Planning Practice Guidance on Housing for Older and Disabled People

(63-016a-20190626) states that authorities should base calculations on the average number of adults living in a house and use published Census data. The calculation has considered the 'mode' average of numbers of adults per household, i.e. the number most represented. In the case of both Waveney and Suffolk Coastal this is two adults aged 65 and over per household, and therefore a ratio of two bed spaces to one dwelling has been applied. It should be recognised however that the number of one adult households in this age category is almost as significant and therefore the ratio of 2 bed spaces equating to one dwelling is considered to be a conservative approach. It is also recognised that some forms of C2 use may accommodate more than one person, for example some forms of extra care accommodation, and this is taken into account on a site by site basis.

31. Completions data related to residential institutions is also presented for the Waveney area (in Appendix C). This is not presented for the Suffolk Coastal area as there is no requirement to consider past supply when the standard method is used to identify the housing number.

Lapse Rates

32. It should be acknowledged that lapse rates have not been included in the calculations. It is not a requirement of the Planning Practice Guidance to apply lapse rates, and the Council has therefore, more appropriately, applied the relevant buffers, obtained evidence to understand delivery and removed sites which are not anticipated to come forward in the five years, as per the Planning Practice Guidance.

Suffolk Coastal Local Plan area

33. Under paragraph 73 of the National Planning Policy Framework, the housing land supply calculation for the Suffolk Coastal area is carried out using the housing needs figure identified through the standard methodology. Paragraph 73 states that local planning authorities should apply the standard methodology figure where adopted strategic policies are more than five years old. The Suffolk Coastal Core Strategy and Development Management Policies Development Plan Document was adopted in July 2013 and therefore it is appropriate that the standard method figure is used.
34. The calculation of the housing need figure follows the guidance in the Planning Practice Guidance (February 2019) and using the 2018 affordability ratios published by the Office for National Statistics on 28th March 2019. The former Suffolk Coastal's affordability ratio has increased from the previous level of 8.95 (2017) to 10.07. If applied following the new standard method, the District's housing need is 542 dwellings per annum. The full calculation is set out in Appendix A.
35. Paragraph 73 of the Framework requires local planning authorities to apply an additional buffer of 5% to ensure choice and competition in the market for land. However, the buffer should be increased to 20% where there has been a persistent under delivery of housing, as indicated by the Housing Delivery Test results. As the Housing Delivery Test has been met, with a result of 128% (as published in February 2019), it is appropriate to apply a 5% buffer. Therefore the 5 year housing supply target is 2,846 (an annual average of 569 dwellings).
36. The Planning Practice Guidance states that where the standard method is used it is not necessary to consider any past under delivery as the methodology accounts for past delivery:

‘The affordability adjustment is applied to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately. (Housing and Economic Needs Assessment, Paragraph 2a-011-20190220).’
37. The housing requirement, including buffer, is set out in Table SC1 below.

Table SC1 – 5 year housing requirement, including buffer

a	5 year supply target (5 x 542)	2,710
b	5% buffer (a x 5%)	136
c	Total 5-year supply target (a + b)	2,846

Identifying and assessing deliverable sites

38. **Table SC4 Assessment of sites in 5-year supply** (Appendix B) sets out the sources of supply for the five year period. The **Housing Trajectory** presents the projected completions against the housing requirement.
39. The methodology set out in paragraphs 10 - 29 in this document have been used to assess and identify deliverable sites allocated in the Waveney Local Plan, sites with extant planning permission or sites where the principle of development has been accepted (such as those approved subject to a satisfactory S106 agreement).

Table SC2 – Summary table of sources of deliverable supply 2019 – 2024

Source of supply	2019/20	2020/21	2021/22	2022/23	2023/24
Major sites (sites of 10 or more dwellings) with outline planning permission / resolution to grant subject to Section 106	0	98	338	384	407
Allocations (Local Plan and Neighbourhood Plans)	0	10	100	190	190
Major sites (sites of 10 or more dwellings or 0.5ha or more) with full planning permission	490	440	316	177	84
Small sites (below 10 dwellings or 0.5ha) with planning permission	97	279	172	19	11
C2 – residential institutions	0	22	27	0	0
Windfall ¹	0	0	50	50	50
Sub Totals	587	849	1,003	820	742
Total	4,001				

¹ No windfall allowance is included for the first two years to avoid double counting with permissions

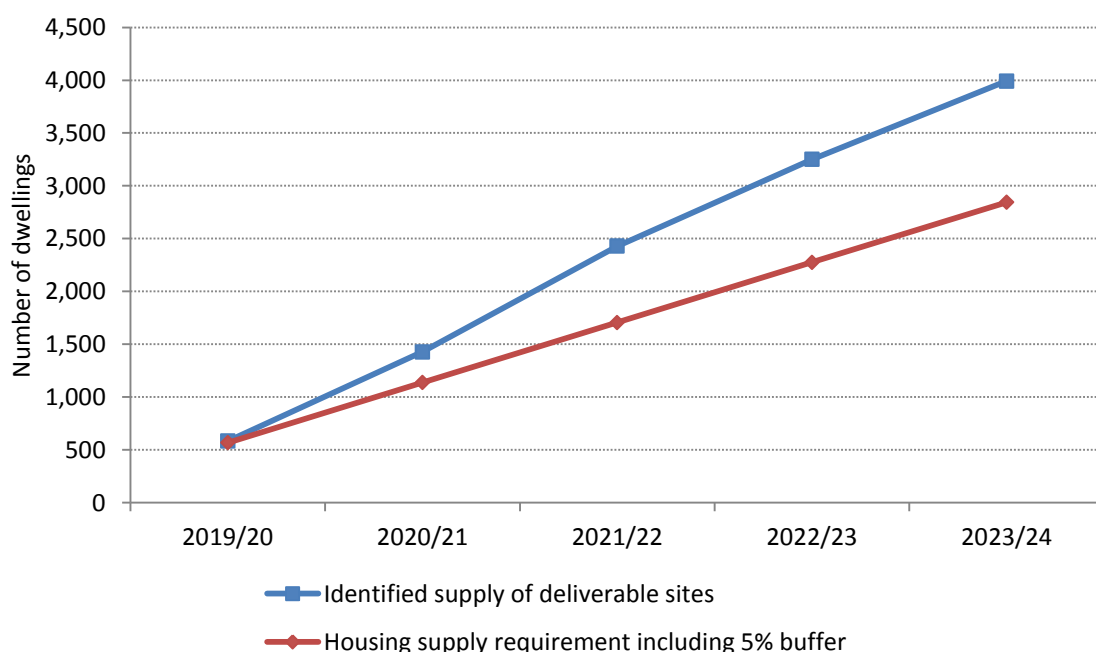
Table SC3 – number of units and years identified against the requirement

a	five year supply requirement including 5% buffer (Table SC1)	2,846
b	annual requirement (a / 5)	569
c	total number of units identified (Table SC2)	4,001
d	number of units above or below 5 year supply requirement (c-a)	1,155
e	number of years of deliverable housing land (c / b)	7.03

Results summary

40. This statement has identified sites within the former Suffolk Coastal area that are considered capable of delivering 4,001 dwellings within the 5-year housing supply period. The requirement is 2,846 dwellings, therefore this represents an over provision of 1,155 dwellings.
41. In conclusion, this statement identifies sites capable of delivering **7.03 years** of housing land supply.

Housing Trajectory



Waveney Local Plan area

42. The Waveney Local Plan covers the former District of Waveney, excluding that part which falls within the Broads Authority area. The Waveney Local Plan (March 2019) identifies a need for 8,223 new homes over the plan period (2014-2036). This equates to 374 new homes per year. For the period April 2014 to March 2019 a total of 1,870 dwellings should have therefore been completed. However, only 1,116 homes have been completed (Appendix D). This is a shortfall of 754 homes (equivalent to 2.02 years).
43. Paragraph 1.7 and Policy WLP1.1 (Scale and Location of Growth) of the Waveney Local Plan makes clear that the Council will apply the 'Liverpool' approach with respect to recovering shortfall in housing delivery. This means shortfalls in delivery will be recovered over the remainder of the plan period rather than within a five year period.
44. The current shortfall of 754 homes will therefore be spread across the remaining 17 years of the plan period i.e. 2019 to 2036. This equates to an additional 45 dwellings per year for the majority of the plan period, reducing to 44 in the final two years.
45. The National Planning Policy Framework requires local planning authorities to apply an additional buffer of 5%, 10% or 20% to ensure choice and competition or where there has been a significant under delivery of housing, as demonstrated through results of the Housing Delivery Test. In the case of the former Waveney area, the required buffer is 20% as delivery was below 85% (at 72%) as reported in the Housing Delivery Test, as published in 2019. In accordance with the Planning Practice Guidance (paragraph 68-022-20190722) the buffer is added to the requirement including the shortfall.
46. The 5 year housing land supply requirement for the former Waveney area is therefore 2,514 dwellings or 503 dwellings per annum, as set out in Table W1 below.

Table W1 – 5 year housing requirement, including shortfall and buffer

a	5 year supply target (5 x 374)	1,870
b	Shortfall (5 x 45)	225
c	20% buffer (a+b x 20%)	419
d	Total 5-year supply target (a + b + c)	2,514

Identifying and assessing deliverable sites

47. **Table W4 Assessment of sites in 5-year supply** (see Appendix C) sets out the sources of supply for the five year period. The **Housing Trajectory** presents the projected completions against the housing requirement.
48. The methodology set out in paragraphs 10 - 29 in this document have been used to assess and identify deliverable sites allocated in the Waveney Local Plan, sites with extant planning permission or sites where the principle of development has been accepted (such as those approved subject to a satisfactory S106 agreement).

Table W2 – Summary table of sources of deliverable supply 2019 – 2024

Source of supply	2019/20	2020/21	2021/22	2022/23	2023/24
Major sites (sites of 10 or more dwellings) with outline planning permission / resolution to grant subject to Section 106	35	112	295	393	351
Allocations (Local Plan and Neighbourhood Plans)	0	46	304	366	374
Major sites (sites of 10 or more dwellings) with full planning permission	76	92	106	86	128
Small sites (below 10 dwellings) with planning permission	96	88	133	27	0
C2 – residential institutions	13	0	0	0	0
Windfall ¹	0	0	63	63	62
Sub Totals	220	338	901	935	915
Total	3,309				

¹ No windfall allowance is included for the first two years to avoid double counting with permissions

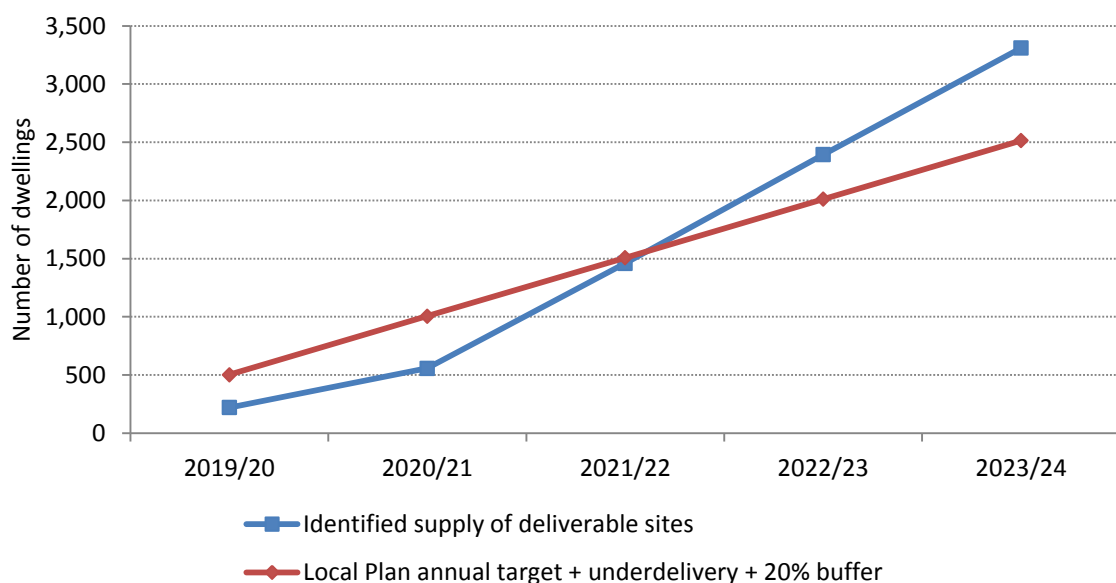
Table W3 – number of units and years identified against the requirement

a	five year supply requirement including Local Plan shortfall and 20% buffer (Table W1)	2,514
b	annual requirement (a / 5)	503
c	total number of units identified (Table W2)	3,309
d	number of units above or below 5 year supply requirement (c-a)	795
e	number of years of deliverable housing land (c / b)	6.58

Results summary

49. This statement has identified sites within the former Waveney area that are considered capable of delivering 3,309 dwellings within the 5-year housing supply period. The requirement is 2,514 dwellings, therefore this represents an over provision of 795 dwellings.
50. In conclusion, this statement identifies sites capable of delivering **6.58 years** of housing land supply.

Housing trajectory



Residential Institutions

51. Waveney completion data for the period 1 April 2014 to 31 March 2019 shows a total of 50 bedrooms have been completed within C2 residential institutions (care homes/nursing homes). Applying the ratio of 2:1 this is equivalent to 25 dwellings (Appendix D). This has not been included within the completions figures to avoid the creation of alternative figures to those reported previously, however should be acknowledged as having contributed towards past delivery in the Waveney area.

Monitoring

52. Progress on delivery of sites is monitored throughout the year from information provided by Building Control and Council Tax. This is supplemented by site visits at the end of the monitoring year.
53. As discussed earlier in this document, sites with planning permission for 5 or more units or allocated in Local Plans or Neighbourhood Plans have been subject to specific consultation with applicants/developers to assess whether they are considered achievable within 5 years. The forms used to inform this housing land supply statement are shown in Appendix E. However, the Council engages with developers, landowners and agents on an ongoing and daily basis in relation to development proposals, in particular through the Development Management service. The Council also holds a Developer Forum with developers and agents, where the Council will present or discuss topical planning matters, which therefore provides a further opportunity to understand general issues around delivery.
54. This statement will be updated annually to maintain an up to date position on housing land supply.
55. The Council's Local Plan Authority Monitoring Report provides data on housing completions (including tenure, house types and sizes) and commitments. The first East Suffolk Authority Monitoring Report will cover the monitoring period 1st April 2018 to 31st March 2019.

Appendices

The appendices are contained in a separate document:

Appendix A: Housing need figure for the Suffolk Coastal Local Plan area

Appendix B: Table SC4 Assessment of sites in 5 year supply (Suffolk Coastal Local Plan area)

Appendix C: Table W4 Assessment of sites in 5-year supply (Waveney Local Plan area)

Appendix D: Delivery of Dwellings in the Waveney Local Plan area

Appendix E: Developers survey forms

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