

Statement of Housing Land Supply as at 31 March 2020

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 2020 to 31st March 2025.

This statement confirms that the **Suffolk Coastal Local Plan** area of East Suffolk has a housing land supply of **5.88 years**.

This statement confirms that the **Waveney Local Plan** area of East Suffolk has a housing land supply of **6.04 years**.

Introduction

1. The current National Planning Policy Framework (NPPF) was published 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 former districts 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. The Suffolk Coastal Local Plan was adopted on 23rd September 2020 and the Waveney Local Plan was adopted on 20th March 2019.
3. The Planning Practice Guidance on Housing Land Supply (published in July 2019), 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). The Waveney Local Plan was adopted by the predecessor authority (Waveney District Council) shortly prior to the creation of East Suffolk Council.
4. The Housing Delivery Test results to date have been published separately for the former Suffolk Coastal and Waveney areas. In terms of housing land supply however, the latest results (published in February 2020) place both areas in the same category i.e. the 85% threshold for delivery has been exceeded meaning that a 5% rather than 20% buffer is applied in this year’s assessment.

5. For the reasons above it is appropriate that the position in relation to five year supply is considered separately for the two Local Plan areas, however this is presented in one statement reflecting that both areas are within East Suffolk.

6. This Statement of Housing Land Supply covers the period 1st April 2020 to 31st March 2025 and therefore has a base date of 1st April 2020. As at 31st March 2020, the Local Plan for the former Suffolk Coastal area comprised 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 ‘saved’ policies of the 2001 Local Plan. A new Local Plan for the former Suffolk Coastal area was adopted on 23rd September 2020, setting a new housing requirement for the area including a strategy, policies and site allocations to deliver this. As at the baseline of 1st April 2020, under paragraph 73 of the NPPF the housing requirement contained in the Core Strategy is out of date as it is over five years old 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, should be used in the calculation of the housing land supply. This figure is 489 dwellings per year (if apportioned to the Suffolk Coastal area – the housing need figure for the full district is 866). However, the Suffolk Coastal Local Plan adopted in September 2020 sets a more ambitious housing requirement for the period 2018 - 2036, based upon local housing need calculated at the point of Submission of the Local Plan of 542 dwellings per year. As the Local Plan is now adopted and sets the strategy that the Council is aiming to deliver, it is considered appropriate to consider the higher requirement of 542 in this assessment.

7. The 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.

8. The NPPF sets out the definition of ‘deliverable’, placing 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 setting out 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.’

9. In preparing the Housing Land Supply Statement, the Council has therefore placed emphasis upon understanding the deliverability of sites which fall under criterion b) above.
10. The five years considered in this statement are 1st April 2020 to 31st March 2025. The 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.
11. The Council has also produced a Housing Action Plan, reflecting the results of the 2019 Housing Delivery Test which for the former Waveney area fell below the 95% threshold and therefore triggered the requirement to produce an action plan:

LPA	Number of homes required ¹				Number of homes delivered ²				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%

2019 Housing Delivery Test results, published February 2020

The Housing Action Plan, produced for the full local planning authority area, sets 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. The Housing Action Plan, most recently updated in August 2020, can be viewed on the Council’s website at www.eastsuffolk.gov.uk/planning/housing-action-plan/.

¹ Based on the [Housing Delivery Test Rule Book](#), which includes transitional measures whereby household projections are applied where plans are over 5 years old.

² 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

12. The 2020 Statement of Housing Land Supply has been produced at a time where there is a considerable degree of uncertainty, including in the development sector, due to the ongoing Covid-19 pandemic. The impacts on the development sector have included the temporary closure of construction sites and the need to ensure social distancing when these reopened, impacts on materials supply and delays in carrying out site surveys. In the longer term there is economic uncertainty which may impact on consumer confidence. Through engagement with the development sector as part of the gathering of evidence to inform this Statement, the Council has sought to understand whether there are any particular issues related to the pandemic that are likely to have an impact on housing delivery. These issues have also been analysed in the Housing Action Plan and the Council will continue to engage with developers, agents and landowners as appropriate to understand any issues as the situation evolves.
13. The Housing Action Plan sets out the details of the way in which the Council has continued to support the development sector through the lockdown and the ongoing restrictions, including in relation to ensuring that the supply of land for housing can continue to come forward, for example through seeking photographic evidence in lieu of being able to undertake site visits in the consideration of planning applications and through holding virtual planning committees. The Council also continued to progress the Suffolk Coastal Local Plan through its Examination, to its adoption in September 2020, allocating land for a further 3,935 dwellings on top of existing allocations and permissions.
14. The Government has also introduced measures aimed at supporting the construction industry, including through the Business and Planning Act 2020 which has extended the expiry date on permissions which would have lapsed between 23rd March 2020 and 31st December 2020, subject in some instances to an Additional Environmental Approval.
15. Nevertheless, the Council must acknowledge that the pandemic will have had an impact on housing delivery and some level of impact is likely to continue in the short term at least. Whilst this is largely a delivery issue rather than a land supply issue the explanation of how the Council has considered this in its assessment is set out in the methodology section of this report.

Methodology

16. The calculations for the Suffolk Coastal Local Plan area and Waveney Local Plan area are set out in the chapters below. 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 in separate tables. This section sets out the Council's approach to obtaining evidence to inform the anticipated rates of delivery.
17. 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

18. 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.
19. 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.

20. In relation to such sites, the Council has therefore gathered evidence on completions, commencements and number of units under construction through use of data and information from 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 recent progress to identify an appropriate build out rate for the five year period.
21. Analysis of past permissions and completions was undertaken as part of the Council's first Housing Action Plan in 2019 and has been revisited as part of the 2020 Housing Action Plan. This identifies that small sites take on average just over 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 completions would take place 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 would follow a different pattern or has been delayed.
22. Where outline permission is granted for sites of less than ten dwellings, completions are anticipated to begin later in the five year period to allow time for reserved matters to be granted.
23. For sites with full planning permission but which are major development (and which therefore fall within this category), 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 15 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.

24. For major sites with full permission within this category, the Council has analysed the information that it has received in relation to the impacts on delivery due to Covid-19. This information was obtained through the Housing Land Supply proformas.
25. Of the sites where construction had started or were part complete, just under half of those who responded indicated that construction had been delayed due to Covid-19, and that this would result in a reduction and/or delay in completions during the year. However, there is a divergence of responses with some indicating that there would be no change. Based on these results it can be reasonably assumed that, overall, those sites that have started construction will take longer to build out.
26. Of those where full permission is granted but that have not yet started, impacts related to Covid-19 have also seen delivery programmes pushed back for a number of reasons including lack of materials supply and being unable to start construction. Consumer confidence was also identified as an uncertainty going forward. A number of respondents indicated that the predicted completions during this year will be lower.
27. In reflection of the responses received and the uncertainty surrounding impacts from Covid-19, the Council has taken a particularly cautious approach and where no evidence has been forthcoming from the relevant developer or agent for those sites with full permission where completions would have been anticipated in 2020/21, it has been assumed that there will be an impact during this year and next. A 50% drop in delivery in 2020/21 and 25% in 2021/22 have been applied to account for this. Impacts will be revisited in subsequent Housing Land Supply Statements and will be monitored through engagement with the development sector.
28. 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 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.

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

29. 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.
30. 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.
31. 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 providing information from the Council’s records to the developer / agent / landowner, chasing up responses and offering assistance. The Council also sent reminders and followed up with further email or telephone contact as necessary. 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.

32. The phasing information provided in responses 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 this shows that medium sites (10-50 dwellings) deliver around 15 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.
33. The Council has analysed the information that it has received through the proformas in relation to the impacts on delivery due to Covid-19. Of those sites that are allocations or which have outline consent, some delays were reported in relation to preparatory work such as surveys, however most respondents did not consider there would be delays to construction, largely due to the stage that the development is at. Demand for new homes was however identified as an uncertainty going forward. The Council has therefore considered the sites on a case by case basis. As these sites have not been directly impacted by the closing of construction sites or on-site restrictions, any specific impacts will be revisited in subsequent Housing Land Supply Statements and will be monitored through engagement with the development sector.

Windfall

34. 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.
35. 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.

36. In the Suffolk Coastal area, the new Suffolk Coastal Local Plan anticipates 50 windfall dwellings being completed per year, and this rate is therefore applied in this assessment from year 3 onwards.
37. In the Waveney area analysis has been undertaken of past windfall completions of the type that would be supported by policies in the Waveney Local Plan. This has identified 363 windfall completions over the past 5 years (an average of 72.6 per year). It is therefore considered appropriate to also apply the rate of 50 windfall dwellings per year from year 3 onwards in the Waveney area, the past average providing confidence that this rate would be achieved.
38. To avoid double counting with existing permissions no contributions from windfall are identified in the first two years of the supply period.

Losses

39. 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

40. 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. To align with the approach adopted by the Ministry of Communities and Local Government in counting completions to inform the Housing Delivery Test, the Council has applied a ratio of 1.8 to 1 in calculating the dwelling equivalent provided for by residential institutions (in other words, for every 1.8 residents in an institution, 1 housing unit will be assumed).
41. Completions data related to residential institutions is presented in Appendix C alongside the data on housing completions in the Waveney Local Plan area.

Lapse Rates

42. 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. As set out above, the Business and Planning Act 2020 has also introduced extensions for those permissions that would lapse between 23rd March 2020 and 31st December 2020³. There is only one permission (for 1 dwelling) that would have lapsed between 23rd March 2020 and 31st March 2020 (the end of the monitoring period) however at the time of writing no application for Additional Environmental Approval had been submitted/approved and therefore it is not included in the five year supply.

³ Unimplemented full planning permissions due to lapse between 19th August and 31st December 2020 are automatically extended to 1st May 2021. Full planning permissions that lapsed between 23rd March and 18th August can be extended until 1st May 2021 however this is dependent on the granting of Additional Environmental Approval. Outline planning permission with time limits for implementation between 19th August and 31st December 2020 are automatically extended to 1st May 2021. Outline planning permission with time limits for implementation between 23rd March and 18th August 2020 are extended to 1st May 2021 if Additional Environmental Approval is granted in respect of the relevant planning permission. Any time limit for the submission of applications for approval of reserved matters which would have expired between 23rd March and 31st December 2020 is extended to 1st May 2021.

Suffolk Coastal Local Plan area

43. Under paragraph 73 of the NPPF local planning authorities should apply the housing needs figure as calculated through the standard methodology 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 was over five years old at the 1st April 2020, the base date for the five year period covered by this assessment.
44. The calculation of the housing need figure follows the guidance in the Planning Practice Guidance (February 2019) and uses the 2019 affordability ratios published by the Office for National Statistics on 19th March 2020. The affordability ratio for East Suffolk is 7.85. If applied following the standard method, the minimum housing need would be 489 dwellings per annum (the relevant proportion of the need for East Suffolk of 866). The full calculation is set out in Appendix A.
45. However, the Suffolk Coastal Local Plan adopted in September 2020 sets a more ambitious housing requirement for the period 2018 - 2036, based upon local housing need calculated at the point of submission of the Local Plan of 542 dwellings per year. As the Local Plan is now adopted and sets the strategy that the Council is aiming to deliver, it is considered appropriate to focus the housing land supply statement upon demonstrating there is sufficient supply to meet this higher requirement.
46. The Inspector examining the Suffolk Coastal Local Plan considered the Council's last Statement of Housing Land Supply (August 2019) and the housing trajectory in the Local Plan and concluded in his report that 'the plan will provide a deliverable five-year supply of housing land measured against the housing requirement on adoption and I have reasonable confidence that a 5 year housing land supply can be maintained throughout the plan period.' (paragraph 62). This Statement updates the 2019 Statement of Housing Land Supply and provides a detailed account of housing land supply as at 31st March 2020. The new sites allocated in the Suffolk Coastal Local Plan do not feature in the calculations in this Statement as they were not adopted at 31st March 2020 but will be included in subsequent calculations. However, to provide an indication of their likely contribution to supply anticipated delivery rates are set out in Appendix F.
47. Paragraph 73 of the Framework requires local planning authorities to apply an additional buffer of 5% to the housing requirement 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. Under footnote 39 of the NPPF, a Housing Delivery Test result of below 85% would trigger the 20% buffer. As the Housing Delivery Test has been met, with a result of 127% (as published in February 2020), it is appropriate to apply a 5% buffer. Therefore, using the requirement of 542 dwellings per year, the 5 year housing supply target is 2,846 (an annual average of 569 dwellings).

48. 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).’

Past delivery is therefore not relevant when calculating the five year supply using the standard methodology figure as at 1st April 2020 of 489.

49. In relation to the use of a housing requirement set out in an up to date Local Plan, the Planning Practice Guidance sets out that ‘Where areas deliver more completions than required, the additional supply can be used to offset any shortfalls against requirements from previous years’ (Housing Supply and Delivery Paragraph: 032 Reference ID: 68-032-20190722). Whilst completions for 2018/19 and 2019/20 in the former Suffolk Coastal area have exceeded the housing requirement in the new Local Plan, it is not therefore possible to take this positive record of delivery into account in the calculations. However, there is no shortfall to account for.
50. The housing requirement of 542 dwellings, including buffer, is set out in Table SC1 below. The calculations using the housing need figure of 489 are set out in Appendix F.

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

51. **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.
52. The methodology set out in this document has been used to assess and identify deliverable sites that are allocations, 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), as at 31st March 2020.

Table SC2 – Summary table of sources of deliverable supply 2020 – 2025

Source of supply	2020/21	2021/22	2022/23	2023/24	2024/25
Major sites (sites of 10 or more dwellings) with outline planning permission / resolution to grant subject to Section 106	0	0	226	328	339
Allocations (Local Plan and Neighbourhood Plans)	0	0	75	170	155
Major sites (sites of 10 or more dwellings or 0.5ha or more) with full planning permission	238	323	379	224	187
Small sites (below 10 dwellings or 0.5ha) with planning permission	108	247	113	18	11
C2 – residential institutions	0	15	31	8	0
Windfall ¹	0	0	50	50	50
Sub Totals	346	585	874	798	742
Total	3,345				

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

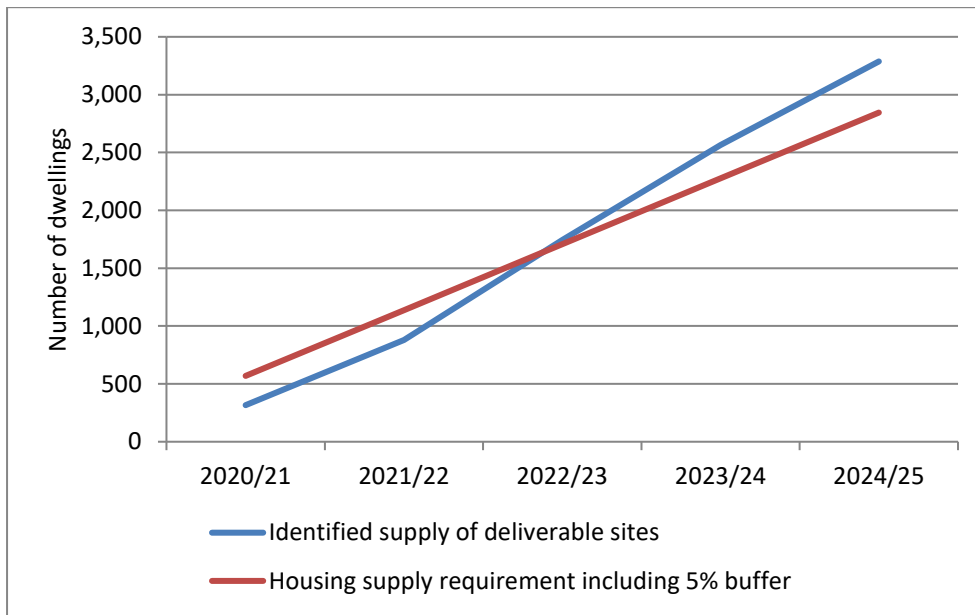
Table SC3 – number of units and years identified against the requirement

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)	3,345
d	number of units above or below 5 year supply requirement (c-a)	499
e	number of years of deliverable housing land (c / b)	5.88

Results summary

53. This statement has identified sites within the former Suffolk Coastal area that are considered capable of delivering 3,345 dwellings within the 5-year housing supply period. The requirement is 2,846 dwellings, therefore this represents an over provision of 499 dwellings.
54. In conclusion, this statement identifies sites capable of delivering **5.88 years** of housing land supply as at 31st March 2020.
55. It is important to note that the calculation above for the former Suffolk Coastal area, whilst based on the recently adopted housing requirement of 542 dwellings, does not include the sites that are new housing allocations in the Local Plan as these did not have the status of being allocated sites at 31st March 2020. A trajectory for these sites is contained in Appendix F and shows anticipated completions of a further 481 dwellings over the period to 31st March 2025, which if included in the calculation would provide 6.72 years of supply. The figure presented in paragraph 54 above is therefore considerably underestimating the actual supply over the next five years in the former Suffolk Coastal area following the recent adoption of the Plan. Sites included in the newly adopted Plan will be included in the calculations as part of future Statements of Housing Land Supply.
56. The calculation using the local housing need figure as at 1st April 2020 of 489 dwellings is contained in Appendix G and shows 6.52 years housing land supply (without considering the new allocations in the Suffolk Coastal Local Plan).

Housing Trajectory



Waveney Local Plan area

57. 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 2020 a total of 2,244 dwellings should have therefore been completed. However, only 1,275 homes have been completed (Appendix D). This is a shortfall of 969 homes (equivalent to 2.59 years).
58. Paragraph 1.7 and Policy WLP1.1 (Scale and Location of Growth) of the Waveney Local Plan make 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.
59. The current shortfall of 969 homes will therefore be spread across the remaining 16 years of the plan period i.e. 2020 to 2036. This equates to an additional 61 dwellings per year for the first nine remaining years of the plan period, reducing to 60 in the final seven years.
60. Paragraph 73 of the NPPF 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. Under footnote 39 of the NPPF, a Housing Delivery Test result of below 85% would trigger the 20% buffer. As the former Waveney area has a result of 89% (as published in February 2020), it is appropriate to apply a 5% buffer.
61. The 5 year housing land supply requirement for the former Waveney area is therefore 2,284 dwellings, or 457 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 61)	305
c	5% buffer (a+b x 5%)	109
d	Total 5-year supply target (a + b + c)	2,284

Identifying and assessing deliverable sites

62. **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.
63. The methodology set out in this document has 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 2020 – 2025

Source of supply	2020/21	2021/22	2022/23	2023/24	2024/25
Major sites (sites of 10 or more dwellings) with outline planning permission / resolution to grant subject to Section 106	0	11	118	157	162
Allocations (Local Plan and Neighbourhood Plans)	0	13	100	298	387
Major sites (sites of 10 or more dwellings) with full planning permission	103	291	304	149	135
Small sites (below 10 dwellings) with planning permission	98	173	38	8	0
C2 – residential institutions	0	0	58	9	0
Windfall ¹	0	0	50	50	50
Sub Totals	201	488	668	671	734
Total	2,762				

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

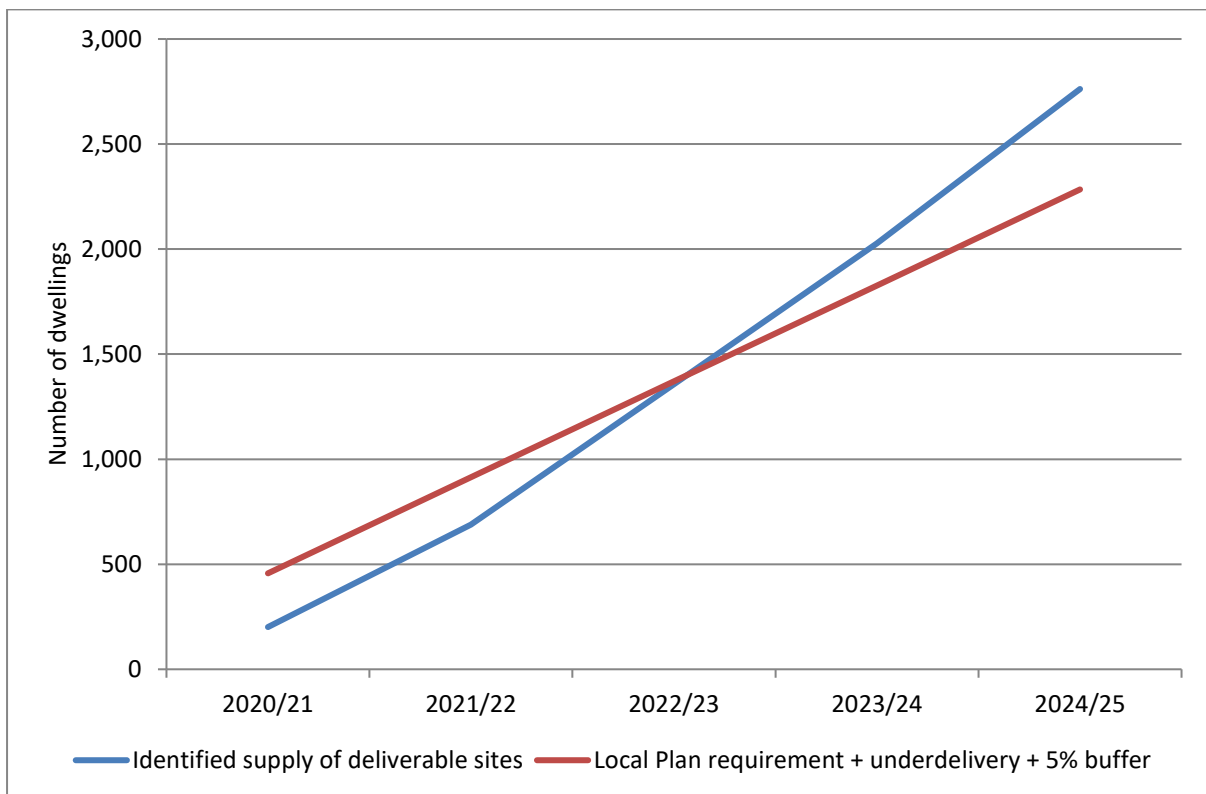
Table W3 – number of units and years identified against the requirement

a	Five-year supply requirement including 5% buffer (Table W1)	2,284
b	annual requirement (a / 5)	457
c	total number of units identified (Table W2)	2,762
d	number of units above or below 5-year supply requirement (c-a)	478
e	number of years of deliverable housing land (c / b)	6.04

Results summary

64. This statement has identified sites within the former Waveney area that are considered capable of delivering 2,762 dwellings within the 5-year housing supply period. The requirement is 2,284 dwellings, therefore this represents an over provision of 478 dwellings.
65. In conclusion, this statement identifies sites capable of delivering **6.04 years** of housing land supply.

Housing trajectory



Completions of Residential Institutions

66. Waveney completion data for the period 1 April 2014 to 31 March 2020 shows a total of 73 bedrooms have been completed within C2 residential institutions (care homes/nursing homes). This is equivalent to 37 dwellings (Appendix D). This has not been included within the completions figures for consistency with the Planning Practice Guidance, however should be acknowledged as having contributed towards past delivery in the Waveney area.

Monitoring

67. 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.
68. 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's Housing Action Plan sets out further actions to support the delivery of housing.
69. This statement will be updated annually to maintain an up to date position on housing land supply. The Council is anticipating one Housing Delivery Test result for East Suffolk in 2020 and it may therefore be appropriate in future years to provide a single housing land supply calculation for East Suffolk.
70. The Council's Local Plan Authority Monitoring Report provides data on housing completions (including tenure, house types and sizes) and commitments. The Authority Monitoring Report for 2019/20 will be published in December 2020.

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 proformas

Appendix F: Assessment of housing land supply in the Suffolk Coastal area against the local housing need figure

Appendix G: Calculation of housing land supply using standard method figure (Suffolk Coastal area)

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