

# Statement of Housing Land Supply as at 31 March 2021

Identifying a five year supply of  
deliverable land for housing

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

Published October 2021



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The five years covered in this assessment are 1st April 2021 to 31st March 2026.

This statement confirms that the **Suffolk Coastal Local Plan** area of East Suffolk has a housing land supply of **6.52 years**.

This statement confirms that the **Waveney Local Plan** area of East Suffolk has a housing land supply of **5.74 years**.

**Erratum (18<sup>th</sup> November 2021)** – changes made to table W2 to reflect corrections in Appendices re DC/16/2157/FUL and DC/17/2675/ARM. The correction does not affect the overall housing land supply calculation. The changes made are shown in track changes below.

Major sites (sites of 10 or more dwellings) with outline planning permission / resolution to grant subject to Section 106	0	0	<del>6040</del>	210	226
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Major sites (sites of 10 or more dwellings or 0.5ha or more) with full planning permission	<del>239241</del>	351	<del>189207</del>	117	86
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<b>Sub Totals</b>	<b><del>312314</del></b>	<b>498</b>	<b><del>518516</del></b>	<b>647</b>	<b>725</b>
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# Introduction

1. The current National Planning Policy Framework (NPPF) was published in July 2021. Paragraph 74 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 1<sup>st</sup> 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 have separate Local Plans identifying separate housing requirements. The Suffolk Coastal Local Plan was adopted on 23<sup>rd</sup> September 2020 and the Waveney Local Plan was adopted on 20<sup>th</sup> 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. The Housing Delivery Test results also inform the assessment of housing land supply. The 2020 result, published in January 2021, was published for East Suffolk.
4. For the reasons above the five year supply is assessed separately for the two Local Plan areas, and also for East Suffolk.
5. This Statement of Housing Land Supply covers the period 1<sup>st</sup> April 2021 to 31<sup>st</sup> March 2026 and therefore has a base date of 1<sup>st</sup> April 2021. As at 31<sup>st</sup> March 2021, the Local Plan for the former Suffolk Coastal area is the Suffolk Coastal Local Plan (adopted September 2020) and the Local Plan for the former Waveney area is the Waveney Local Plan (adopted March 2019). As at the baseline of 1<sup>st</sup> April 2021, under paragraph 74 of the NPPF the housing requirements contained in the Local Plans are less than five years old and therefore the housing requirements contained in these will be used in the calculation of housing land supply.

6. The Suffolk Coastal Local Plan sets out a housing requirement of 542 dwellings per year over the period 2018 – 2036 The Waveney Local Plan sets out a housing requirement of 374 dwellings per year over the period 2014 – 2036.
7. The 2020 Housing Delivery Test result for East Suffolk was 109% and therefore the 85% threshold for delivery has been exceeded meaning that a 5% rather than 20% buffer is applied in this year's assessment.
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 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 involve considerations appropriate to each Local Plan area, and these are therefore set out separately in the relevant sections of this Statement. The results have been used to also present a figure for East Suffolk.
  11. The Council has also produced a Housing Action Plan. Whilst this year there is no requirement for the Council to produce a Housing Action Plan, as the Housing Delivery Test

has been passed, the Council has committed to reviewing its Housing Action Plan, first published in 2019, each year. The 2020 result, published in January 2021, is set out below:

LPA	Number of homes required <sup>1</sup>				Number of homes delivered <sup>2</sup>				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%

*2020 Housing Delivery Test results published January 2021*

12. The 2020 Housing Delivery Test results were modified by the Government to reflect the impact of the Covid-19 pandemic on the construction sector. A months' worth of housing requirement was removed from the calculations. A written ministerial statement<sup>3</sup> was issued on 6<sup>th</sup> September 2021 explaining that a deduction of 122 days' worth of requirement will be made for the year 2020/21 in this year's Housing Delivery Test results, expected to be published in November 2021, to reflect the disruption caused to the construction sector due to the pandemic. Whilst past completions in the plan period also play a part in the calculation of housing land supply, the Government has not set out any amended guidance for undertaking housing land supply calculations.
13. The Housing Action Plan 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 July 2021, can be viewed on the Council's website at [www.eastsuffolk.gov.uk/planning/housing-action-plan/](http://www.eastsuffolk.gov.uk/planning/housing-action-plan/).
14. The 2021 Statement of Housing Land Supply has been produced at a time where there is still a degree of uncertainty, including in the development sector, due to the ongoing Covid-19 pandemic. Earlier impacts on the development sector included the temporary closure of construction sites. More recently factors such as the pandemic and Brexit are understood to be impacting on materials supply and costs. 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, this year, any particular issues related to the pandemic (as well as any other issues) that are likely to have an impact on housing delivery. These issues

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

<sup>2</sup> 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](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/865156/HDT_Technical_Note_2019.pdf)

<sup>3</sup> [Housing Delivery Test - Monday 6 September 2021 - Hansard - UK Parliament](#)

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. Any site specific issues reported are reflected in the anticipated delivery of that specific site, however many responses did not identify any current issues affecting construction.

15. In response to the pandemic, in summer 2020 the Government 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 23<sup>rd</sup> March 2020 and 31<sup>st</sup> December 2020, subject in some instances to an Additional Environmental Approval.
16. The Housing Action Plan sets out the details of the way in which the Council has continued to support the development sector through the pandemic, including in relation to ensuring that the supply of land for housing can continue to come forward through maintaining its development management services and through continuing to progress planning policy documents to support the implementation of the Local Plans.
17. Under paragraph 75 of the NPPF a local authority with a ‘recently adopted’ Local Plan (as defined in footnote 40 of the NPPF) can produce an Annual Position Statement, which is examined by the Planning Inspectorate. This year the Suffolk Coastal Local Plan falls within the definition of ‘recently adopted’. However, it is not a requirement to go down the Annual Position Statement route and the Council has opted to produce its housing land supply statement as per previous years.

## Methodology

18. 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 A (Suffolk Coastal Local Plan area) and Appendix B (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.

19. A calculation for East Suffolk has been undertaken based on the total housing requirement and total housing supply as assessed for each Local Plan area.
20. This section sets out the Council's approach to obtaining evidence to inform the anticipated rates of delivery. 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<sup>4</sup> and on Housing Supply and Delivery<sup>5</sup> 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

21. 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.
22. 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.
23. 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

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<sup>4</sup> [www.gov.uk/guidance/housing-and-economic-land-availability-assessment](http://www.gov.uk/guidance/housing-and-economic-land-availability-assessment)

<sup>5</sup> [www.gov.uk/guidance/housing-supply-and-delivery](http://www.gov.uk/guidance/housing-supply-and-delivery)



proforma, see Appendix D), 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.

24. 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 further Housing Action Plans. This identifies that small sites (up to 10 dwellings) take on average just over one year from grant of full 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, unless there is reason to believe that development might complete later such as due to the age of the permission. 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, such as where a development has been under construction for some time.
25. 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. Analysis of past data shows that the majority of such sites complete within five years of the outline consent being granted.
26. For sites which are major development of 10 or more dwellings or 0.5ha or more but which have full planning permission but (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 12 dwellings per annum appear to have been achieved on average (once anomalies are removed from the data)<sup>6</sup>. For sites of over 50 dwellings, there is insufficient recent data for East Suffolk to identify any trends, and therefore specific

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<sup>6</sup> Analysis of sites which have completed over the past three years (2018/19 – 2020/21)

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.

27. For major sites with full permission within this category, last year the Council analysed information that it received in relation to the impacts on delivery due to Covid-19. In reflection of the recent closure of sites at that time and the uncertainty surrounding impacts from Covid-19, the Council took a particularly cautious approach and where no evidence had been forthcoming from the relevant developer or agent for those sites with full permission and where completions would have been anticipated in 2020/21, it was assumed that there would be an impact. A 50% drop in delivery in 2020/21 and 25% in 2021/22 was applied to account for this. Recent data and analysis has shown, however, that whilst delivery of housing may have been significantly impacted in the early months of the pandemic, for example where sites closed completely, there is no current evidence that suggests sites in East Suffolk will deliver 25% fewer dwellings this year that they otherwise would. Data on quarter by quarter delivery shows that whilst completions in the first and second quarters of 2020/21 were lower than the previous year, delivery picked up in the third and fourth quarters, and it is not considered necessary therefore to apply any across the board reductions this year. Any specific issues raised for individual sites in the questionnaire responses have however been considered.
28. Appendices A and B 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 (see Appendix D) contains questions on various matters 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 A and B, 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 12 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. For sites of over 500 dwellings, for which it is not possible to look at averages and trends on a district wide basis due to the small number of such sites, specific attention needs to be paid to the circumstances of the sites themselves.

33. The Council considers the information provided in responses to inform its judgement as to whether a site is likely to deliver in the next five years. The Council will not necessarily repeat the information provided but will use it in making a judgement about the deliverability of a site. On occasions the figures provided by a respondent do not tally with the current number allocated or permitted however for the purposes of the Housing Land Supply the Council will ensure that the figures reflect the planning status.
34. 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 last year in relation to preparatory work such as surveys. Wider issues acknowledged this year include the availability and cost of materials, however for sites at outline permission or allocation stage it is difficult to predict whether this will have an impact once it comes to the build stage and the Council has considered the sites on a case by case basis in terms of whether there are currently any specific issues reported in the survey responses.
35. When contacting the development sector or landowners, the Council sends either an email or letter (depending on the contact details held) and attaches a form which if sent by email can be returned by clicking a button in the form which will automatically attach it to a return email. The Council provided two and half weeks to return the information but provides additional time by chasing responses after this date. To understand whether there are ways in which the Council could improve the collection of information on sites, a new question was included in the proforma this year asking whether there are any ways in which the Council could improve the way it consults with the development sector to obtain this information. The majority of respondents suggested the way this is collected is appropriate, however questions were raised over how the information provided is translated into the Statement. The 'evidence' fields in the appendices explain whether a response was received or not and whether the anticipated delivery rates have been applied or amended and, if so, why. The Council also informs respondents when the Statement is finalised.

## Windfall

36. Paragraph 71 of the NPPF 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.
37. 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.
38. For 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.
39. For 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 343 windfall completions over the past 5 years (an average of 68.6 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.
40. To avoid double counting with existing permissions no contributions from windfall are identified in the first two years of the supply period.

## Losses

41. 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 A and B for the Suffolk Coastal Local Plan area and the Waveney Local Plan area.

## Residential Institutions

42. The Planning Practice Guidance (Paragraph 68-035-20190722) states that local planning authorities need to 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 of completions and anticipated delivery therefore incorporates residential institution completions, in line with the Planning Practice Guidance. To align with the approach adopted by the 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 bed spaces in an institution, 1 housing unit will be assumed).
43. Anticipated delivery of accommodation in residential institutions is included in Appendices A and B and completions data related to residential institutions is presented in Appendix C as part of the data on housing completions for both Local Plan areas.

## Lapse Rates

44. 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. The Business and Planning Act 2020 introduced extensions for those permissions that would lapse between 23<sup>rd</sup> March 2020 and 31<sup>st</sup> December 2020<sup>7</sup>. The expiry date of permissions could be extended to 1<sup>st</sup> May 2021, meaning some permissions that would have expired before the end of March 2021 were still

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<sup>7</sup> Unimplemented full planning permissions due to lapse between 19th August and 31st December 2020 were automatically extended to 1st May 2021. Full planning permissions that lapsed between 23rd March and 18th August could be extended until 1st May 2021 however this was dependent on the granting of Additional Environmental Approval. Outline planning permission with time limits for implementation between 19th August and 31st December 2020 were automatically extended to 1st May 2021. Outline planning permission with time limits for implementation between 23rd March and 18th August 2020 were extended to 1st May 2021 if Additional Environmental Approval is granted in respect of the relevant planning permission. Any time limit for the submission of applications for approval of reserved matters which would have expired between 23rd March and 31st December 2020 was extended to 1st May 2021.

in place at the base date for this Statement (31.3.2021). Two applications for Additional Environmental Approval, required to extend certain permissions, were granted and these related to a 60 bed care home and a first floor extension to the front of a care home.

## Suffolk Coastal Local Plan area

45. The Suffolk Coastal Local Plan covers the former District of Suffolk Coastal. The Suffolk Coastal Local Plan identifies a requirement for 9,756 new homes over the plan period (2018-2036). This equates to 542 new homes per year. For the period 1<sup>st</sup> April 2018 to 31<sup>st</sup> March 2021 a total of 1,626 dwellings should have therefore been completed. Completions figures show that a total of 1,761 were in fact completed (including equivalent dwellings for residential institutions) (see Appendix C).
46. Paragraph 74 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 the Housing Delivery Test result falls below 85% (under footnote 41 of the NPPF). The Housing Delivery Test for East Suffolk has been met, with a result of 109% (as published in January 2021), and therefore a 5% buffer is to be applied.
47. 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). Therefore, whilst cumulatively completions for 2018/19 to 2020/21 (i.e. since the start of the plan period) in the former Suffolk Coastal area have exceeded the housing requirement in the Local Plan, it is not possible to take this additional delivery into account in the calculations. However, there is no shortfall to account for.
48. The housing requirement of 542 dwellings, 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

49. **Table SC4 Assessment of sites in 5-year supply** (Appendix A) sets out the sources of supply for the five year period. The **Housing Trajectory** presents the projected completions against the housing requirement.
50. 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 31<sup>st</sup> March 2021.

Table SC2 – Summary table of sources of deliverable supply 2021 – 2026

Source of supply	2021/22	2022/23	2023/24	2024/25	2025/26
Major sites (sites of 10 or more dwellings) with outline planning permission / resolution to grant subject to Section 106	0	61	175	250	256
Allocations (Local Plan and Neighbourhood Plans)	0	6	124	281	510
Major sites (sites of 10 or more dwellings or 0.5ha or more) with full planning permission	208	375	356	228	112
Small sites (below 10 dwellings or 0.5ha) with planning permission	85	231	181	41	31
C2 – residential institutions	0	2	40	0	5
Windfall <sup>1</sup>	0	0	50	50	50
<b>Sub Totals</b>	<b>293</b>	<b>675</b>	<b>926</b>	<b>850</b>	<b>964</b>
<b>Total</b>	<b>3,708</b>				

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



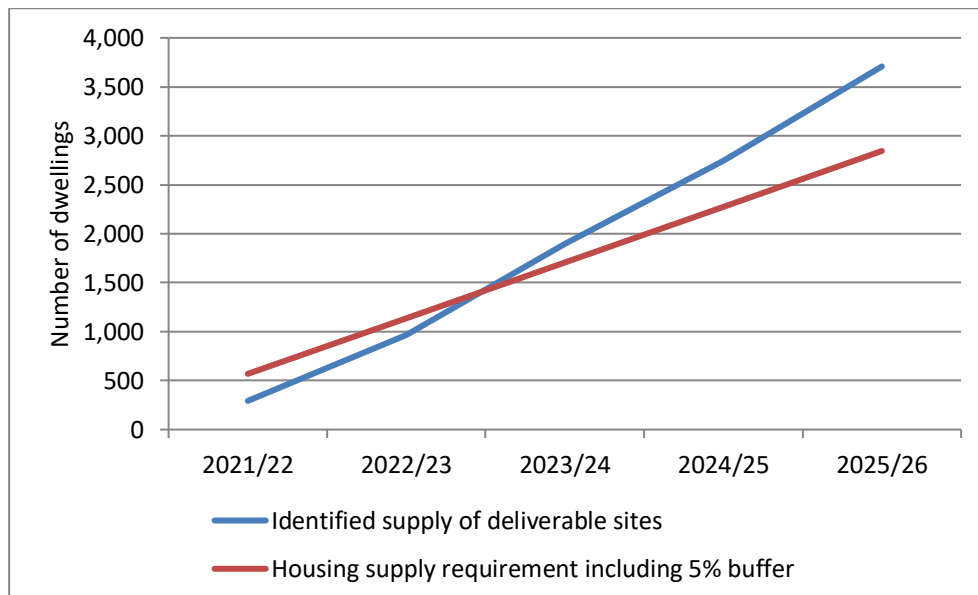
Table SC3 – number of units and years identified against the requirement

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)	3,708
d	number of units above or below 5 year supply requirement (c-a)	862
e	number of years of deliverable housing land (c / b)	6.52

## Results summary

51. This statement has identified sites within the former Suffolk Coastal area that are considered capable of delivering 3,708 dwellings within the 5-year housing supply period. The requirement is 2,846 dwellings, therefore this represents an over provision of 862 dwellings.
52. In conclusion, this statement identifies sites capable of delivering **6.52 years** of housing land supply as at 31<sup>st</sup> March 2021.

## Housing Trajectory



## Waveney Local Plan area

53. 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 2021 a total of 2,618 dwellings should have therefore been completed. 1,519 homes have been completed (including dwelling equivalents for residential institutions, see Appendix C). This is a shortfall of 1,099 homes.
54. 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.
55. The current shortfall of 1,099 homes will therefore be spread across the remaining 15 years of the plan period i.e. 2021 to 2036. This equates to an additional 74 dwellings per year for the first four remaining years of the plan period, reducing to 73 in the final eleven years.
56. Paragraph 74 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 the Housing Delivery Test result falls below 85% (under footnote 41 of the NPPF). The Housing Delivery Test for East Suffolk has been met, with a result of 109% (as published in January 2021), and therefore a 5% buffer is to be applied.
57. The 5 year housing land supply requirement for the former Waveney area is therefore 2,351 dwellings, or 470 dwellings per annum, as set out in Table W1 below.

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

<b>a</b>	5 year supply target (5 x 374)	1,870
<b>b</b>	Shortfall (4 x 74, +73)	369
<b>c</b>	5% buffer (a+b x 5%)	112
<b>d</b>	Total 5-year supply target (a + b + c)	2,351

## Identifying and assessing deliverable sites

58. **Table W4 Assessment of sites in 5-year supply** (see Appendix B) sets out the sources of supply for the five year period. The **Housing Trajectory** presents the projected completions against the housing requirement.
59. 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 2021 – 2026

Source of supply	2021/22	2022/23	2023/24	2024/25	2025/26
Major sites (sites of 10 or more dwellings) with outline planning permission / resolution to grant subject to Section 106	0	0	40	210	226
Allocations (Local Plan and Neighbourhood Plans)	0	0	81	183	351
Major sites (sites of 10 or more dwellings or 0.5ha or more) with full planning permission	241	351	207	117	86
Small sites (below 10 dwellings or 0.5ha) with planning permission	42	144	129	35	12
C2 – residential institutions	31	3	9	52	0
Windfall <sup>1</sup>	0	0	50	50	50
<b>Sub Totals</b>	<b>314</b>	<b>498</b>	<b>516</b>	<b>647</b>	<b>725</b>
<b>Total</b>	<b>2,700</b>				

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

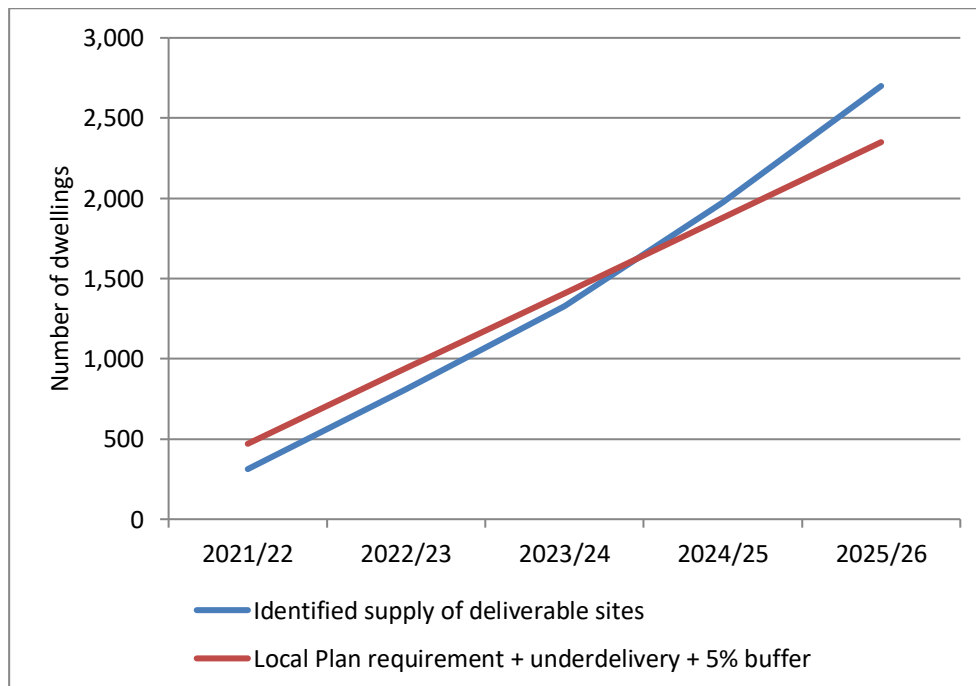
Table W3 – number of units and years identified against the requirement

a	Five-year supply requirement including 5% buffer (Table W1)	2,351
b	annual requirement (a / 5)	470
c	total number of units identified (Table W2)	2,700
d	number of units above or below 5-year supply requirement (c-a)	349
e	number of years of deliverable housing land (c / b)	5.74

## Results summary

60. This statement has identified sites within the former Waveney area that are considered capable of delivering 2,700 dwellings within the 5-year housing supply period. The requirement is 2,351 dwellings, therefore this represents an over provision of 349 dwellings.
61. In conclusion, this statement identifies sites capable of delivering **5.74 years** of housing land supply.

## Housing trajectory



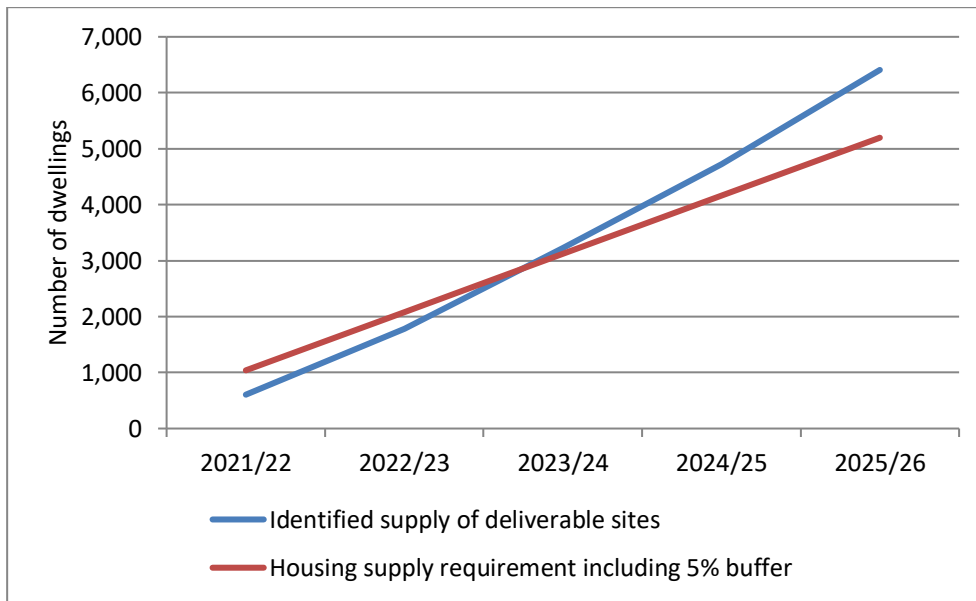
## East Suffolk

As the 2020 Housing Delivery Test (published January 2021) is published at the East Suffolk level, this report also presents the Housing Land Supply figure for East Suffolk. Using the assessments for each Local Plan area set out above, the total requirement is 5,197 dwellings and the total supply is 6,408 dwellings. This equates to a housing land supply of **6.17** years, as set out table ES1 below.

Table ES1 – Housing Land Supply position for East Suffolk

a	Suffolk Coastal requirement (Table SC1)	2,846
b	Waveney requirement (Table W1)	2,351
c	East Suffolk requirement (a + b)	5,197
d	Annual requirement (c/5)	1,039
e	Suffolk Coastal supply (Table SC2)	3,708
f	Waveney supply (Table W2)	2,700
g)	East Suffolk supply (e + f)	6,408
h)	Number of units above or below 5 year supply requirement (g-c)	1,211
i)	number of years of deliverable housing land (g/d)	6.17

## Housing trajectory



## Monitoring

62. 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.
63. 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 proforma used to inform this housing land supply statement is shown in Appendix D. 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.
64. This statement will be updated annually to maintain an up to date position on housing land supply.
65. 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 2020/21 will be published in December 2021.

# Appendices

The appendices are contained in a separate document:

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

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

Appendix C: Past completions

Appendix D: Developers survey proformas



Email us 

**Planning Policy and Delivery Team (Local Plans)**

Planningpolicy@eastsoffolk.gov.uk

**Development Management (Planning Applications)**

planning@eastsoffolk.gov.uk


Call us 

**Planning Policy and Delivery Team (Local Plans)**

01394 444557 / 01502 523029

**Development Management (Planning Applications)**

01502 523100

Write to us 

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

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